Supreme Court, U. S.
FILED
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MICHAEL RODAK, JR., CLERK

No. 9, Original

In the Supreme Court of the United States

OCTOBER TERM, 1974

UNITED STATES OF AMERICA,
Plaintiff,

v.

STATE OF LOUISIANA, ET AL.,
Defendants.

APPENDICES II AND III TO THE EXCEPTIONS OF THE STATE OF LOUISIANA TO THE REPORT OF THE SPECIAL MASTER FILED JULY 31, 1974, AND BRIEF IN SUPPORT OF EXCEPTIONS

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No. 9, Original

In the Supreme Court of the United States

OCTOBER TERM 1974

UNITED STATES OF AMERICA,
Plaintiff,

v.

STATE OF LOUISIANA, ET AL.,
Defendants.

APPENDIX II, Part 1

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APPENDIX II, Part 2

INDEX TO THE EVIDENCE INTRODUCED BY THE STATE OF LOUISIANA IN THE PROCEEDING BEFORE WALTER P. ARMSTRONG, JR., SPECIAL MASTER

Exhibit 1 Vita of Dr. James P. Morgan

Exhibit 2 LPI 837. Official map of Louisiana, 1969 edition showing geological areas.

Exhibit 3 LPI 1141. Charles G. Holle, *Sedimentation at the Mouth of the Mississippi River, in* PROCEEDINGS OF SECOND CONFERENCE ON COASTAL ENGINEERING, p. 111 (J. W. Johnson ed. 1951).

Exhibit 4 J. P. Morgan, *Ephemeral Estuaries of the Deltaic Environment, in* ESTUARIES, p. 115 (G. H. Lauff ed. 1967).

Exhibit 5 J. P. Morgan, "Deltas—A Résumé," *Journal of Geological Education*, Vol. XVIII, No. 3, pp. 107-117 (May, 1970).

Exhibit 6 J. P. Morgan, J. M. Coleman and S. M. Gagliano, *Mudlumps at the Mouth of South Pass, Mississippi River; Sedimentology, Paleontology, Structure, Origin and Relation to Deltaic Processes,* LOUISIANA STATE UNIVERSITY STUDIES; COASTAL STUDIES SERIES, No. 10 (1963).

Exhibit 7 J. P. Morgan, Transparencies, Vol. 1, GP-1 through GP-31, inclusive, as follows:

LIST OF OVERHEAD TRANSPARENCY ILLUSTRATIONS TO ACCOMPANY TESTIMONY OF

JAMES P. MORGAN CONCERNING GENERAL GEOLOGY, GEOLOGIC PROCESSES AND RESULTING MORPHOLOGY OF THE MISSISSIPPI RIVER DELTA.

(These transparencies were made by James P. Morgan for teaching purposes and for illustrating scientific publications. Where taken from other sources, references are given.)

Chronologic Number of Illustration	*Louisiana Preliminary Identifying Number or Citation*	*Description of Illustration*
GP-1	604	Drainage basin of the Mississippi River.
GP-2	596	Diagrammatic illustration of the longitudinal stream profile.
GP-3	1201	Geologic time scale of the Quaternary Period.
GP-4	1200	Longitudinal profile of the Mississippi River comparing present Gulf level with glacial stage Gulf level.
GP-5	591	Generalized geologic map of Louisiana in relation to glacial stage entrenched Mississippi River.
GP-6	601	Movement of stream load, suspended and bed load.
GP-7	1199	Conventional depositional sedimentary sequence in a water body.

GP-8	600	Diagrammatic illustration of a "Gilbert-type" delta. After G. K. Gilbert, "Lake Bonneville", 1890.
GP-9	598	Idealized concept of delta formation. Stages A-D.
GP-10	605	Hydrography at the mouth of an idealized distributary.
GP-11	594	Longitudinal profiles along an idealized distributary.
GP-12	595	Transverse profiles across an idealized distributary.
GP-13	599	Idealized concept of delta formation. Stages E-F.
GP-14	602	Idealized concept of delta formation. Stage G.
GP-15	597	Idealized representation of depositional environments and sediment types at a distributary mouth.
GP-16	590	Historical sequences of Mississippi Delta lobes from 4600 years (before present) to present time. Modified from Kolb and Van Lopik, 1958.
GP-17	592	Modern Mississippi River subdeltas compared with maps of 1838 and 1960.
GP-18	603	Three-dimensional illustration of the Birdfoot Delta of the Mississippi River. Modified from H. N. Fisk, 1961.

GP-19	593	Schematic diagram showing deltaic progradation in a subsiding delta.
GP-20	589	Stages in the development of interdistributary bays in an abandoned distributary system. From J. P. Morgan, 1967.
GP-21	Fig. 3 "Estuaries"	West Bay in 1816. From J. P. Morgan, 1967.
GP-22	Fig. 4 "Estuaries"	West Bay in 1922. From J. P. Morgan, 1967.
GP-23	Fig. 5 "Estuaries"	West Bay in 1958. From J. P. Morgan, 1967.
GP-24	Fig. 8 "Deltas"	Cubit's Crevasse into Bay Rondo in 1873. From J. P. Morgan, 1970.
GP-25	Fig. 8 "Deltas"	Cubit's Crevasse into Bay Rondo in 1901. From J. P. Morgan, 1970.
GP-26	Fig. 8 "Deltas"	Cubit's Crevasse into Bay Rondo in 1911. From J. P. Morgan, 1970.
GP-27	Fig. 8 "Deltas"	Cubit's Crevasse into Bay Rondo in 1925. From J. P. Morgan, 1970.
GP-28	Fig. 8 "Deltas"	Cubit's Crevasse into Bay Rondo in 1933. From J. P. Morgan, 1970.
GP-29	Fig. 8 "Deltas"	Cubit's Crevasse into Bay Rondo in 1968. From J. P. Morgan, 1970.

GP-30	Fig. 10 "Deltas"	Isopach map showing sedimentary mass in Bay Rondo resulting from Cubit's Crevasse. From J. P. Morgan, 1970.
GP-31	Fig. 7 "Estuaries"	Interdeltaic estuarine basin, Mississippi Delta. From J. P. Morgan, 1967.

REFERENCES TO SOURCES CITED

Fish, H. N., *Bar-finger Sands of the Mississippi Delta. in* GEOMETRY OF SANDSTONE BODIES - A SYMPOSIUM. Tulsa: Am. Assoc. Petroleum Geologists (1961), pp. 29-52.

Gilbert, G. K., Lake Bonneville: United States Geological Survey (1890), Monograph No. 1.

Kolb, C. R., and Van Lopic, J. R., *Geology of the Mississippi River Deltaic Plain, Southeastern Louisiana.* U. S. ARMY CORPS OF ENGINEERS, WATERWAYS EXPT. STA. TECH. REPT. Vicksburg (1958), pp. 3-483 and 3-484.

Morgan, J. P., *Ephemeral Estuaries of the Deltaic Environment*, in ESTUARIES, G. H. Lauff ed.: American Assoc. for Advancement of Science (1967), pp. 115-120.

Morgan, J. P., "Deltas—a Résumé," *Journal of Geological Education.* Vol. XVIII, No. 3 (May, 1970), pp. 107-117.

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Exhibit 8	U.S.C. & G.S. Chart No. 1272 - 22nd edition, December 2, 1968.
Exhibit 9	Photographs of Dr. J. P. Morgan - Volume 2, 1 through 41, inclusive, as follows:

LIST OF PHOTOGRAPHS TO ACCOMPANY TESTIMONY OF JAMES P. MORGAN CONCERNING GENERAL GEOLOGY AND MORPHOLOGY OF THE MISSISSIPPI RIVER DELTA

(All photographs taken by James P. Morgan)

Chronologic Number of Illustration	*Louisiana Preliminary Identifying Number*	*Date of Photograph*	*Description of Photograph*
1	100	6-26-69	Cubit's Crevasse opening from Mississippi River (background)
2	99	6-26-69	Cubit's Crevasse opening from Mississippi River (background) into Bay Rondo area to the east of the Mississippi Delta.
3	127	8-27-69	Cubit's Crevasse area. Mouth of Bienvenue Pass in right foreground, Mississippi Delta.
4	128	8-27-69	Mouth of Dead Woman's Pass (middle background), Cubit's Crevasse area, Mississippi Delta.
5	129	8-27-69	Mouth of Dead Woman's Pass (middle ground) Mississippi Delta.
6	102	8-27-69	Town of Venice, La. and the Jump (background) leading into West Bay. Inundation and property damage resulting from Hurricane Camille.

7	137	9-3-69	View northeast of mouth of Pass Du Bois, Mississippi Delta. West Bay area in background.
8	136	9-3-69	View southeast of mouth of Pass Du Bois, Mississippi Delta. Aerial view of area shown on TL-185 through 189.
9	135	9-3-69	View north at mouth of Pass Du Bois, Mississippi Delta. Ground photograph showing exhumed marsh and shell piled up by wave action resulting from Hurricane Camille.
10	131	9-3-69	Ground photo. View north at mouth of Pass Du Bois, Mississippi Delta.
11	134	9-3-69	View northwest at mouth of Pass Du Bois, Mississippi Delta. Ground photo of exhumed marsh and scattered shell resulting from Hurricane Camille.
12	132	9-3-69	View north at mouth of Pass Du Bois, Mississippi Delta. Ground photograph.
13	133	9-3-69	View northeast at mouth

			of Pass Du Bois, Mississippi Delta. Ground photograph of exhumed marsh.
14	120	8-27-69	View downstream along South Pass, Mississippi Delta. Note sedimentation in East Bay (right) through breaks in the West Bank of South Pass.
15	167	9-3-69	View of west bank, South Pass, Mississippi Delta. East Bay in foreground.
16	119	8-27-69	Sedimentation in East Bay, Mississippi Delta, through breaks in the West bank of South pass.
17	118	8-27-69	West bank of South Pass, Mississippi Delta (foreground). The Crevasse into Garden Island Bay in background.
18	117	8-27-69	West bank of South Pass, Mississippi Delta (foreground). Note lighthouse on the levee at right of photo.
19	75	6-26-69	Sediment-laden water flowing across Southwest Pass levees into West Bay, Mississippi Delta.
20	160	9-3-69	West bank of South Pass, Mississippi Delta. East Bay to right.

21	158	9-3-69	Crevasse opening into East Bay from South Pass, Mississippi Delta. Midway between Upper Cave Light and Old Grand Bayou Light.
22	163	9-3-69	Mud flats and marsh extending into East Bay from west bank of South pass, Mississippi Delta.
23	170	9-3-69	View looking east-northeast across shoal in East Bay, Mississippi Delta. South Pass and fresh water reservoir in distance.
24	105	8-27-69	Mouth of Southwest Pass (right background) and sand spit extending into East Bay, Mississippi Delta.
25	145	9-3-69	East Bay sand spit. Southwest Pass and levees in background.
26	144	9-3-69	East Bay sand pit. Southwest Pass and levees in background.
27	143	9-3-69	East Bay sand spit. Southwest Pass and levees in background.
28	104	8-27-69	View south along sand spit in East Bay. South-

			west Pass, Mississippi River in right of photo.
29	76	6-26-69	View West toward Mouth of Southwest Pass showing sand spit extending northward into East Bay, Mississippi Delta.
30	140	9-3-69	East bank of Southwest Pass, Mississippi Delta in foreground. Note sand spit extending into East Bay (middle ground).
31	146	9-3-69	North end of sand spit in East Bay. Southwest Pass in background. Double Bayou in distance.
32	112	8-27-69	View northwest across Joseph Bayou area. Southwest Pass in background, Mississippi Delta.
33	150	9-3-69	Joseph Bayou area. Upper end of East Bay, Mississippi Delta. Head of Passes in background, Joseph Bayou in foreground.
34	152	9-3-69	View south down Joseph Bayou into East Bay, Mississippi Delta.
35	149	9-3-69	View east across mouth of Joseph Bayou, Mississippi Delta. South Pass in background.

36	151	9-3-69	Joseph Bayou area. Upper end of East Bay, Mississippi Delta. Head of Passes in background, Joseph Bayou in foreground.
37	154	9-3-69	Upper (northern) end of East Bay, Mississippi Delta. Head of Passes in background.
38	116	8-27-69	View northwest across Joseph Bayou area, Mississippi Delta.
39	113	8-27-69	View west across south end of Joseph Bayou area, Mississippi Delta.
40	147	9-3-69	View southeast across East Bay. Mouth of Joseph Bayou in center of photograph. South Pass in distance.
41	148	9-3-69	View southeast across East Bay. Mouth of Joseph Bayou in left middle ground. South Pass in distance.

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Exhibit 10	J. P. Morgan, *Genesis and Paleontology of the Mississippi River Mudlumps*, Louisiana Geological Survey, Bulletin No. 35 (1961).
Exhibit 10-A	Exhibits to James P. Morgan, *Gene-*

sis and Paleontology of the Mississippi River Mudlumps, Louisiana Geological Survey, Bulletin No. 35 (1961).

Exhibit 11 J. P. Morgan, J. R. Coleman and S. M. Gagliano, *Mudlumps: Diapiric Structures in Mississippi Delta Sediments, in* DIAPIRISM AND DIAPIRS, Am. Assoc. Petroleum Geologists, Memoir No. 8, pp. 145-161 (1968).

Exhibit 12 Photographs by Dr. J. P. Morgan of Mudlumps, Vol. 3, 1 through 52, inclusive, as follows:

LIST OF PHOTOGRAPHS AND ILLUSTRATIONS TO ACCOMPANY TESTIMONY OF JAMES P. MORGAN CONCERNING MUDLUMPS AT THE MOUTHS OF THE MISSISSIPPI RIVER

(all illustrations or photographs by James P. Morgan unless otherwise annotated)

Chronologic Number of Illustration	*Louisiana Preliminary Identifying Number or Citation*	*Date of Photograph or Publication*	*Description of Photograph or Illustration*
1	Fig. 1, Mem. 8	1968	Areas of mudlump development at major distributary mouths, Mississippi River Delta.
2	98	6-26-69	Mudlump islands seaward from Pass A Loutre-North Pass, Mississippi Delta (background).

3	97	6-26-69	Mudlump island seaward from mouth of Pass A Loutre, Mississippi Delta.
4	95	6-26-69	Mudlump islands seaward from mouth of Pass A Loutre, Mississippi Delta.
5	96	6-26-69	Detail of largest mudlump island off mouth of Pass A Loutre, Mississippi Delta. Island is also shown on photos TL-54 and TL-56.
6	Fig. 6, Bull. 35	Sept. 61	Schematic cross section of typical mudlump, indicating stratigraphic and structural characteristics.
7	Fig. 4, Bull. 35	Sept. 61	Furrowed surface appearance of mudlump island. Aerial photograph of NP-3 taken April 1948 (H. N. Fisk) [1].
8	93	6-26-69	Mudlump seaward from mouth of Northeast Pass, Mississippi Delta. See photo TL-51 for relationship to land.
9	92	6-26-69	Ground photograph showing details of mudlump island at mouth of Northeast Pass, Mississippi Delta. See photo TL-51 for relationship to land.
10	125	8-27-69	Southeast Pass mudlump

[1] Photograph taken April 1948 by H. N. Fisk.

			islands with the mouth of the pass in background. See TL-132.
11	87	6-26-69	Mouth of Southeast Pass, Mississippi Delta (background) and some of the mudlump islands.
12	124	8-27-69	Southeast Pass mudlump islands. View taken looking seaward. See TL-134.
13	85	6-26-69	Mudlump seaward from the mouth of Southeast Pass, Mississippi Delta. Old Balize Bayou in left background.
14	89	6-26-69	Detail of mudlump island nearest mouth of Southeast Pass, Mississippi Delta. (See photo TL-40, TL-45 and TL-46 also of same island.)
15	91	6-26-69	Same as TL-43. Detail of mudlump island nearest mouth of Southeast Pass, Mississippi Delta (See photo TL-40).
16	90	6-26-69	Same as TL-43. Detail of mudlump island nearest mouth of Southeast Pass, Mississippi Delta (See photo TL-40).
17	88	6-26-69	Group of three mudlump

			islands seaward from the mouth of Old Balize Bayou, Mississippi Delta.
18	84	6-26-69	South Pass jetties, sand spit and mudlumps. Fresh water-marine water boundary in left foreground.
19	81	6-26-69	Detail of central mudlump shown on photo TL-37. Mudlumps No. 89-90 and South Pass sand spit and jetties in distance.
20	121	8-27-69	East Jetty South Pass, Mississippi Delta (foreground). Coast Guard Station and Bar Pilot Station on west bank. Mudlump islands in background.
21	122	8-27-69	Shoal area waves over South Pass sand spit which was breached by Hurricane Camille. South Pass mudlump islands in left middle ground.
22	123	8-27-69	South Pass mudlump islands. Waves breaking (left middle ground) show position of sand spit which was breached by Hurricane Camille.
23	Fig. 44, Bull. 35	Sept. 61	Aerial photograph of South Pass mudlumps.

			Left to right, Sp-4, Sp-1, Sp-2 and Sp-3.
24	82	6-26-69	Spit composed of organic matter (coffee grounds) extending westward from mudlumps 89-90 at mouth of South Pass into East Bay, Mississippi Delta.
25	77	6-26-69	Ground photo showing spit comprised of organic material (coffee grounds) extending East Bay from Mudlump 89-90 at mouth of South Pass, Mississippi Delta.
26	168	9-3-69	Ground photograph looking south of South Pass mudlump 89-90. Note wave cut bench and "ramassis" (plant debris) from Hurricane Camille.
27	Fig. 16, Bull. 35	Sept. 61	Raised terrace, left foreground, has resulted from secondary uplift of island SP-1. Tilting has caused the cliff to increase from 2 feet (foreground to about 5 feet (background). Two earlier terraces are shown at left.
28	Fig. 7, Mem. 8	1968	Coring operations on mudlump 89-90, South Pass.
29	977	8-63	View looking south of

			borehole casing in mudlump SP 89-90. Small mudlump island in background is mudlump 92, "the castle."
30	989	6-63	View looking south at mudlump 92, "the castle."
31	1006	1-69	View looking northeast of South Pass sand spit with mudlump No. 92 in foreground.
32	79	6-26-69	Detail of central mudlump shown on photo TL-27, mouth of South Pass, Mississippi Delta.
33	78	6-26-69	Three mudlumps breaking the water surface at mouth of South Pass, Mississippi Delta. Note: Mudlumps are shown on the seaward (right margin) side of photo TL-37.
34	80	6-26-69	Detail of rear (easternmost) mudlump shown on photo TL-27, South Pass, Mississippi Delta.
35	979	11-64	Ground view on south side of mudlump 94, South Pass.
36	981	11-64	Ground view of mudlump 94 with geologists collecting fossils.

37	967	11-64	Ground photograph looking toward the northwest of the west side of mudlump 93 at South Pass. Photograph taken at low tide.
38	Fig. 4, 1968 Mem. 8		South Pass mudlump islands mapped during period from 1876 to 1961.
39	Fig. 5, 1968 Mem. 8		Island and submarine mudlump distribution at South Pass. Data from 123 maps dated between 1876 and 1961.
40	Fig. 42, Sept. 61 Bull. 35		Advance of the bar at South Pass, 1920 to 1950.
41	Fig. 43, Sept. 61 Bull. 35		Map of the bar at South Pass. Submarine mudlumps indicated.
42	Fig. 10, 1968 Mem. 8		Sites of appearance of initial mudlumps and their progression, determined from maps dated between 1867 and 1961.
43	Fig. 40, Sept. 61 Bull. 35		Advance of the bar at Southwest Pass, 1920 to 1950.
44	Fig. 41, Sept. 61 Bull. 35		Map of the bar at Southwest Pass. Submarine mudlumps indicated.
45	Fig. 36, Sept. 61 Bull. 35		Schematic diagram showing relationship between bar growth and mudlump development.

46	Fig. 6, 1968 Mem. 8	Bore-hole locations and profile line along South Pass sand spit.
47A	Fig. 22, 1968 Mem. 8	Diagrammatic representation of South Pass mudlump origin and development, Stage A.
47B	Fig. 22, 1968 Mem. 8	Diagrammatic representation of South Pass mudlump origin and development, Stage B.
47C	Fig. 22, 1968 Mem. 8	Diagrammatic representation of South Pass mudlump origin and development, Stage C.
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47E	Fig. 23, 1968 Mem. 8	Diagrammatic representation of South Pass mudlump origin and development, Stage E.
47F	Fig. 23, 1968 Mem. 8	Diagrammatic representation of South Pass mudlump origin and development, Stage F.
47G	Fig. 23, 1968 Mem. 8	Diagrammatic representation of South Pass mudlump origin and development, Stage G.

47H	Fig. 23, 1968 Mem. 8		Diagrammatic representation of South Pass mudlump origin and development, Stage H.
48	Fig. 9, 1968 Mem. 8		Shallow subsurface stratigraphy and structure of South Pass. Line of section is shown in Fig. 6.
49	Fig. 18, 1968 Mem. 8		Multiple reverse faulting found on wave-planed surface of South Pass mudlump 94.
50	Fig. 5, 1963 C.S.I No. 10		Comparison maps showing South Pass sand spit development and its relationship to mudlump islands.
51	LPI No. 968	Dec. 1969	View looking southwest of steamship aground in East Bay. Mudlump 89-90 in foreground and mudlump 93 in left rear of photograph.
52	LPI No. 965	Dec. 1969	Steamship aground in East Bay to the west of mudlump 93.

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PUBLICATIONS CITED

Morgan, James P., "Mudlumps at the Mouths of the Mississippi River," *in Genesis and Paleontology of the Mississippi River Mudlumps.* Louisiana Geological Survey, Bulletin No. 35 (1961), pp. 1-116.

Morgan, James P., Coleman, James M., and Gagliano, Sherwood M., *Mudlumps: Diapiric Structures in Mississippi Delta Sediments, in* DIAPIRISM AND DIAPIRS. American Association of Petroleum Geologists, Memoir No. 8 (1968), pp. 145-161.

Morgan, James P., Coleman, James M., and Gagliano, Sherwood M., *Mudlumps at the Mouth of South Pass, Mississippi River; Sedimentology, Paleontology, Structure, Origin, and Relation to Deltaic Processes.* LOUISIANA STATE UNIVERSITY STUDIES; COASTAL STUDIES SERIES, No. 10 (1963).

Exhibit 13	LPI 1224)
Exhibit 14	LPI 1228)
Exhibit 15	LPI 1227) Photos of birds and peli-
Exhibit 16	LPI 1226) cans by Dr. Morgan
Exhibit 17	LPI 1225)
Exhibit 18	LPI 1060, "Areas in Dispute in Louisiana Closing Line Contentions."
Exhibit 19	LPI 618, Mudlumps photo, M-101-6 dated June 26, 1969, Mouth of Southeast Pass, Mississippi Delta, with mudlump islands in foreground, view toward the northwest.
Exhibit 20	LPI 617, Photograph by Dr. James

P. Morgan concerning distribution of mudlumps at South Pass, M-101-5 dated June 26, 1969, South Pass mudlumps and sand spit, Mississippi Delta. Mudlump 93 on left of photo. Mudlump 89-90 in the central part of photo and new mudlumps offshore in right central part of photo.

Exhibit 21 LPI 362 through 430—Louisiana Original Brief Exhibit No. 21, 1 through 69 (includes Talcott's 1839 map).

Exhibit 22 LPI 1202—copy of notes by Dr. James P. Morgan and Mr. David Morgan which reflect the published nautical charts of the period of 1873 through 1969 for the Mississippi Delta Region and East Bay changes reflected thereby.

Exhibit 23 LPI 1054. Set of display materials pertaining to historic changes and semicircle data in East Bay. (1839-1956)

Exhibit 23-A LPI 1054 (same as above with the overlays)

Exhibit 24 A list of scientific publications by Dr. James P. Morgan.

Exhibit 25 Case of *The Anna*, 5 C. Rob. 373.

Exhibit 26 LPI 647—Bucket Bend Bay Exhibit.

Exhibit 26-A Corrected sheet to Ex. 26.

Exhibit 27 LPI 1053—Opinion of the Solicitor

Cox, dated December 20, 1963, approved by the then Attorney General, Robert Kennedy, addressed to the General, the Honorable Archibald Secretary of the Interior, at the request of the President concerning lands originally formed as islands in the marginal seas. Attached to the opinion is a letter dated December 20, 1963, by the Attorney General to the Secretary of the Interior expressing his accord.

Exhibit 28 Matters relating to Tern Islands and other Bird Reservations as follows:

Description	*Louisiana Preliminary Identifying Number*
1. Executive Order of August 8, 1907	199 & 217
2. "Bird Lore for 1907," pp. 229 *et seq.*	203
3. Map of the State of Louisiana compiled from the official records of the General Land Office dated 1916 (See Exh. 258)	66
4. Map of the State of Louisiana compiled from the official records of the General Land Office dated 1930	215
5. Map of Plaquemines Parish (South Section), Louisiana, dated 1958	216
6. Quadrangle Map of East Delta, Louisiana, 1959 edition	204
7. 31 F.R. 16024 dated December 15, 1966	

31 F.R. 7686 dated May 24, 1968 — 205

8. 31 F.R. 16027 dated December 15, 1966 — 206

9. 31 F.R. 16027 dated December 15, 1966 — 207

10. *Alaska Pacific Fisheries v. United States*, 39 S.C. 40, 248 U.S. 78 (1918)

11. *United States of America v. State of Alaska, et al.* 423 F. 2d 764 (1970)

12. General correspondence regarding Tern Islands Reservation — 211 & 218

13. Bureau of Land Management Miscellaneous File No. 1883786 — 220

14. Fish and Wildlife Service Files LAEO—Louisiana, Tern Islands and Gas and Oil LA—Louisiana, Tern Islands — 219

15. First Formal Request for Admissions by State of Louisiana dated April 29, 1970, and Response to Louisiana's First Formal Request for Admissions by United States

16. State of Louisiana's Interrogatories dated February 3, 1970, and Response of United States thereto dated March 4, 1970

17. State of Louisiana's Interrogatories dated October 23, 1969, and Answers of United States with attachments thereto dated December 23, 1969

18. State of Louisiana's Request to the Bureau of Sports Fishery dated December 8, 1969, and Response of United States thereto dated January 20, 1970

19. Directory of National Wildlife Refuges — 209

20. Wildlife Sanctuaries in Louisiana from First Biennial Report of the Department of Wild Life and Fisheries Commission, 1944 and 1945 — 210

21. Memorandum dated September 25, 1952, addressed to the Bureau of Land Management suggesting revocation of Tern Islands Reservation — 201

22. Public Land Order No. 892 of April 15, 1953, 18 Federal Register 2342, dated April 22, 1953, which revoked Tern Islands Reservation — 202

23. Birds of Sabine National Wildlife Refuge — 819

24. Birds of Lacassine National Wildlife Refuge — 820

25. Lacassine National Wildlife Refuge — 821

26. Executive Order of August 17, 1907, creating Shell Keys Reservation — 822

27. General correspondence regarding Shell Keys Reservation 824

28. Birds of the Delta National Wildlife Refuge 212

29. National Wildlife Refuges in Southeast Region 4 213

30. General correspondence regarding East Timbalier Island 823

31. Gulf Island National Wildlife Refuges (Breton) 825

32. General correspondence regarding Breton National Wildlife Refuge 826

33. Inspection Report of East Timbalier Bird Reservation dated April 7, 1947, by John Lynch, Biologist 1162

34. Refer the Court to 18 U.S.C. 41

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Exhibit 29 LPI 215 - Map of the State of Louisiana compiled from the Official Records of General Land Office - 1930

Exhibit 30 LPI 1007 - Picture of bird display at Louisiana State University Museum

Exhibit 31 LPI 775)

Exhibit 32 LPI 776)

Exhibit 33 LPI 807)

Exhibit 34 LPI 812)

Exhibit 35 LPI 814) Photographs taken by Allan

Exhibit 36 LPI 816) Ensminger on flight over

Exhibit 37 LPI 800) Mississippi Delta area in January, 1970

Exhibit 38 LPI 805)

Exhibit 39 LPI 815)

Exhibit 40 LPI 798)

Exhibit 41 LPI 1192 - View of fresh dredge spoil jetties (Photograph by Mr. Allan Ensminger)

Exhibit 42 LPI 787 - Photograph taken by Mr. Allan Ensminger on flight over Mississippi Delta area January, 1970

Exhibit 43 LPI 783 - Photograph taken by Mr. Allan Ensminger on flight over Mississippi Delta area, January, 1970

Exhibit 44 LPI 1191 - View of portion of spit above water at mouth of Pass Tante Phine (Photograph by Mr. Allan Ensminger)

Exhibit 45 LPI 1187 - View of portion of spit at Pass Tante Phine above water (Photograph by Mr. Allan Ensminger)

Exhibit 46 LPI 1188 - View of islands breaking up north of West Bay (Photograph by Mr. Allan Ensminger)

Exhibit 47 LPI 1189 - View of island headland at north side of West Bay (Photograph by Mr. Allan Ensminger)

Exhibit 48 LPI 780 - Photograph taken by Mr. Allan Ensminger on flight over Mississippi Delta area in January, 1970

Exhibit 49 Index to Mr. Allan Ensminger's photographs

Exhibit 50 U. S. C. & G. S. Chart No. 1275, Edition 10, June 27, 1970

Exhibit 51 A History of the Inland Water Line, as follows:

A HISTORY OF THE INLAND WATER LINE

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1. Refer the Court to the Act of August 19, 1890 (Rules for the prevention of collisions on the high seas)	
2. Refer the Court to United States Revised Statute 4233, Act of April 29, 1864, c. 69, 13 Stat. 58	
3. Refer the Court to Act of February 19, 1895, and amendments (28 Stat 672 32 Stat 829 37 Stat 736 60 Stat 1097 33 USC 151)	
4. Refer the Court to Act of June 7, 1897 (30 Stat 96)	
5. Department of Treasury Circular No. 127 issued June 13, 1895	188
6. Treasury Department Circular No. 88 of 1897	1161

7. Refer the Court to 1895 Edition of United States Coast & Geodetic Survey Coast Chart No. 194 (Exhibit 6 to Louisiana Brief of October, 1968)	367
8. Treasury Department Circular No. 107 of 1900	189
9. Department of Commerce and Labor Circular No. 61 of March 9, 1905	190
10. Department of Commerce and Labor Circular No. 88 of 1905	191
11. Department of Commerce and Labor Circular No. 158 of November 21, 1907	192
12. Refer the Court to 1907 Edition of United States Coast & Geodetic Survey Coast Chart No. 194 (Exhibit 8 to Louisiana Brief of October, 1968)	369
13. Department of Commerce Circular No. 230 of 1911	193
14. Refer the Court to Exhibit 10 to Louisiana Brief	
15. Department of Commerce Circular No. 230 of June 8, 1917	194
16. Department of Commerce Circular No. 230 of October 10, 1927	195
17. Department of Commerce Circular No. 230 of December 26, 1928	196

18. Department of Commerce Circular No. 230 of December 8, 1932 — 197

19. Refer the Court to Federal regulation of December, 1953

20. Refer the Court to Exhibits 12, 14, 16 and 18 of Louisiana Brief of October, 1968 (prior editions of United States Coast & Geodetic Survey Charts No. 194 and superceding Chart No. 1272) — 373, 375, 377, 379

21. Refer the Court to Exhibit 20 of Louisiana Brief — 381

22. Refer the Court to Maps and other materials showing location of Inland Water Lines designated and defined under the Act of February 19, 1895 — 1027

23. Copy of transcript of hearing on the proposed change of the line of Demarcation held at New Orleans, Louisiana, August 7, 1967 — 49

24. Copy of transcript of public hearing concerning the lines of demarcation between Inland and International Rules of the Road, conducted at Morgan City, Louisiana, on August 3, 1967 — 50

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CENSUS OF THE U.S.

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2. Area Measurement reports published by the Bureau of the Census of the United States Department of Commerce showing areas of Louisiana: 1960, July, 1967, G. E. - 20, No. 20	1129

Exhibit 53 The Captain of the Port of New Orleans, as follows:

THE CAPTAIN OF THE PORT OF NEW ORLEANS

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1. Refer the Court of CFR Subpart 67.50	
2. Refer the Court to 33 CFR Part 6, Parts 121, 122 and 124, 125, 126	

3. Refer the Court to 46 CFR Parts 146, 147

4. Refer the Court to 33 CFR subpart 3.40-75

5. Coast Guard seizure of Przemyal dated October 29, 1927 221

6. Coast Guard seizure of "Emilia G" dated September 24, 1925 222

7. Coast Guard seizure No. 874 of Fleur de Lis 223

8. Coast Guard seizure of Memthis dated April 22, 1930 224

9. Coast Guard seizure of St. Francisco 225

10. United States Coast Guard Law Enforcement at Sea Relative to Smuggling 226

11. Refer the Court to the prohibition case of *Ford, et al. v. United States*, 47 S.Ct. 531

12. Refer the Court to the prohibition case of *Cunard S. S. Co. v. Mellon*, 43 S. Ct. 504

13. Refer the Court to the prohibition case of *Cook v. United States*, 53 S.Ct. 305

14. State of Louisiana's Second Formal Requests for Admissions (with attachments) and Response of United States

15. State of Louisiana's Interrogatories

of October 23, 1969, and Response of United States

16. United States' Interrogatories of January 20, 1970, and Response of State of Louisiana

17. Refer the Court to 33 CFR Subpart 37.50 and 33 CFR subpart 3.40 - 10 regarding New Orleans Marine Inspection Zone

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Exhibit 54 Permits Issued by United States Army Corps of Engineers for Dredging Canals and Other Operations in East Bay, as follows:

PERMITS ISSUED BY UNITED STATES ARMY CORPS OF ENGINEERS FOR DREDGING CANALS AND OTHER OPERATIONS IN EAST BAY

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4. Request from Shell Oil Company to Corps of Engineers, New Orleans District, dated April 21, 1949, and permit dated May 12, 1949, to Shell Oil Company for dredging from records of New Orleans District Corps of Engineers 1155

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31. Oyster Lease No. 59 dated June 17, 1903, to John McLaughlin 715

32. Oyster Lease No. 40 dated May 20, 1903, to John Conaway 720

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34. Oyster Lease No. 644 dated December 21, 1904, to Capt. Erick Anderson 733

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37. Oyster Lease No. 307 dated July 20, 1904, to John W. Jackson 648

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39. Oyster Lease No. 44 dated May 20, 1903, to Frank Miller 718

40. Oyster Lease No. 294 dated May 18, 1904, to Frank Richmond 694

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44. Oyster Lease No. 291 dated May 18, 1904, to Gilmore & Jackson 714

45. Oyster Lease No. 774 dated February 15, 1905, to Joseph Cadro 731

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47. Oyster Lease No. 48 dated May 20, 1903, to Walter Miller 695

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51. Oyster Lease No. 315 dated July 20, 1904, to A. E. Washburn 689

52. Oyster Lease No. 313 dated July 20, 1904, to Morgan Loar & Co. 652

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57. Oyster Lease No. 640 dated December 21, 1904, to John Repath & Co. 687

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61. Oyster Lease No. 3422 dated December 5, 1914, to Mrs. Frank McLaughlin 680

62. Oyster Lease No. 3398 dated November 17, 1914, to United Fish & Oyster Co. 681

63. Oyster Lease No. 3416 dated December 5, 1914, to Mrs. Frank McLaughlin 725

64. Oyster Lease No. 3404 dated November 17, 1914, to United Fish & Oyster Co. 734

65. Oyster Lease No. 3275 dated September 11, 1914, to Zanenovich & Spongia 753

66. Oyster Lease No. 4165 dated November 22, 1918, to Brick Anderson 755

67. Oyster Lease No. 4176 dated November 27, 1918, to Leonard F. Edgecombe 756

68. Oyster Lease No. 3770 dated September 10, 1910, to Frank J. Lobrano 757

69. Oyster Lease No. 3407 dated November 17, 1914, to United Fish & Oyster Co. 758

70. Oyster Lease No. 337 dated July 20, 1904, to John Spongia 760

71. Oyster Lease No. 293 dated May 18, 1904, to E. D. Jones 765

72. Oyster Lease dated March 25, 1903, to Whale Bay Oyster Co. 774

73. Oyster Lease No. 3399 dated November 17, 1914, to United Fish & Oyster Co. 742

74. Oyster Lease No. 1005 dated August 16, 1905, to Lobrano & McLaughlin 751

75. Oyster Lease No. 2842 dated July 15, 1912, to United Fish & Oyster Co. 752

76. Oyster Lease No. 298 dated May 18, 1904, to S. B. George & T. Kelly 772

77. Oyster Lease No. 349 dated November 18, 1908, to Nebert Burns 712

78. Oyster Lease No. 353 dated November 18, 1908, to Octave Barrios 708

79. Oyster Lease No. 386 dated July 20, 1904, to Red Fish Bay Oyster Co. 700

80. Oyster Lease No. 342 dated November 18, 1908, to Thomasin Burrois 690

81. Oyster Lease No. 351 dated June 15, 1905, to Ambroise Ansardi 710

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84. Oyster Lease No. 346 dated June 15, 1905, to P. V. Lacoste 696

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91. Oyster Lease No. 352 dated July 20, 1904, to John Ansel, Jr. 709

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93. Oyster Lease No. 343 dated June 1, 1931, to Frank Musemeche 704

94. Oyster Lease No. 347 dated November 18, 1908, to Jeff C. Wenck 691

95. Oyster Lease No. 311 dated July 20, 1904, to Thomas Bulot & Louis Baril 668

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107. Oyster Lease No. 2737 dated December 1, 1911, to W. J. Armstrong 677

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109. Oyster Lease No. 344 dated November 18, 1908, to George Burrois 705

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111. Oyster Lease No. 4194 dated December 12, 1918, to W. J. Armstrong 724

112. Oyster Lease No. 3636 dated October 18, 1915, to Nick Popich 726

113. Oyster Lease No. 1503 dated June 19, 1907, to W. J. Armstrong 729

114. Oyster Lease No. 340 dated July 20, 1904, to Chris Ansel 746

115. Oyster Lease No. 345 dated June 15, 1905, to Erick Anderson 759

116. Oyster Lease No. 336 dated July 20, 1904, to S. B. George & T. Kelly 768

117. Oyster Lease No. 3788 dated September 19, 1917, to Gulf Packing Co. 771

118. Oyster Lease No. 41 dated May 20, 1900, to Anton Duhon 773

119. Oyster Lease No. 11639 dated July 20, 1948, to Golden Meadows Fisheries Co. 764

120. Oyster Lease No. 11638 dated July 20, 1948, to Golden Meadows Fisheries Co. 767

121. Oyster Lease No. 11640 dated July 20, 1949, to Golden Meadows Fisheries 728

122. Oyster Lease No. 11641 dated July 20, 1948, to Golden Meadows Fisheries Co. 761

123. Oyster Lease No. 11637 dated July 20, 1948, to Golden Meadows Fisheries Co. 766

124. Oyster Lease No. 11642 dated July 20, 1948, to Golden Meadows Fisheries Co. 762

125. Oyster Lease No. 7061 dated July 15, 1929, to Constant Callahan 719

126. Oyster Lease No. 3855 dated November 8, 1917, to Foret, Pelegrin & Bro. 735

127. Oyster Lease No. 9905 dated September 25, 1942, to A. St. Martin & Co. 736

128. Oyster Lease No. 2506 dated May 23, 1918, to Thompson & Nini 737

129. Oyster Lease No. 5757 dated February 17, 1925, to Alonzo Lee 739

130. Oyster Lease No. 7241 dated January 15, 1930, to Aelane Pitre 744

131. Oyster Lease No. 7053 dated July 13, 1929, to Matis Vidos 665

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133. Oyster Lease No. 6032 dated February 6, 1936, to Colsom & Rebeld 671

134. Oyster Lease No. 9337 dated September 29, 1939, to P. R. Norman & N. H. Breaux 667

135. Oyster Lease No. 8252 dated October 10, 1934, to P. R. Norman & N. H. Breaux 743

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137. Oyster Lease No. 8251 dated October 16, 1934, to P. R. Norman & N. H. Breaux 763

138. Oyster Lease No. 8690 dated November 9, 1936, to P. R. Norman & N. H. Breaux 669

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143. Oyster Lease No. 7175 dated November 2, 1929, to Oliver Terrebonne 770

144. Oyster Lease No. 11869 dated April 20, 1949, to Frank & Vincent Bacala 745

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147. Copy of certified copy of lease of water bottoms for oyster purposes from Louisiana Conservation Commission to United Fish and Oyster Company dated October 14, 1914, affecting acreage in East Bay 13

148. Copy of certified copy of application for survey and lease for oyster purposes dated October 9, 1914, by United Fish and Oyster Company to Louisiana Conservation Commission affecting acreage in East Bay 14

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153. Department of Conservation, State of Louisiana Survey showing location and area of Oyster Leases between South Pass and Southwest Pass, Plaquemines Parish, compiled under the direction of Frank T. Payne, Engr. 1921 1164

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155. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 349; 353; 386; 342; 334; 351; 348; 350; 346; 383; 384; 387; 382; 385; 388; 352; 341; 343; 347 842

156. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 311; 314; 320 843

157. Part of map from records of Louisiana Wild Life and Fisheries

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158. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 42; 49; 43; 50; 2737 846

159. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 11,639; 11,638; 11,640; 11,641; 11,637; 11,642; 14,461; 14,240 840

160. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 7053; 7039; 6032; 9337; 8252; 4061; 8251; 8690; 9338A 844

161. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 7164; 4042 847

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56. State Mineral Lease No. 188, 1928 1204
57. State Mineral Lease No. 192, 1928 1205
58. State Mineral Lease No. 195, 1928 1206
59. Refer the Court to a map which reflects information concerning areas affected by mineral leases granted by the State of Louisiana as reflected by the records of the Louisiana State Mineral Board since the period of the creation of that Board. It pertains to East Bay. 1064
60. Refer the Court to an exhibit which reflects the same sort of information as does the exhibit bearing La. Preliminary Identifying Number

1064, except that it pertains to the Caillou Bay Area. 1065

61. Map showing lease block locations in South Pass Area 898

62. U. S. Department of the Interior, Geological Survey, Number, 1950, Mid Continent Map No. 1603 899

63. Pertinent parts of Outer Continental Lease Maps of Louisiana, published by U. S. Department of the Interior, Bureau of Land Management 1150

64. A map published by the Department of Conservation of the State of Louisiana entitled, Oil and Gas Map of Louisiana 1151

65. Map showing lease block locations in Ship Shoal Area 900

66. U. S. Department of the Interior Geological Survey; October, 1950, Mid Continent Map No. 1607, Ship Shoal Area 901

67. Refer the Court to Louisiana Brief Exhibit Number 38 399

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Exhibit 59 Pollution Control, as follows:

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Exhibit 60	Vita of Dr. Leo J. Bouchez	
Exhibit 61-A	First drawing or sketch by Dr. Leo J. Bouchez.	
Exhibit 61-B	Second drawing or sketch by Dr. Leo J. Bouchez.	
Exhibit 62	Written opinion of Dr. Leo J. Bouchez, "The Changing Configuration of the Coast and the Law."	
Exhibit 63	L. J. Bouchez, *The Regime of Bays in International Law*, A. W. Sythoff-Leyden (1964).	
Exhibit 64	LPI 827-A—Data sheet compiled from Gulf Coast Shrimp Data of the U. S. Department of the Interior, on shrimp boat trips	
Exhibit 65	Vita of J. Y. Christmas	

Exhibit 66 LPI—Yu. A. Torin, "Oceanographic Conditions and Fishing in the Gulf of Mexico During Autumn and Winter," (Okeonologicheskie usloviya i promysel ryby v. Meksikanskom zalive v. oseene-zimii period), *in Trudy Atlanticheskogo Nauchno-Issledovatel' skogo Instituta Rybnogo Khozyaistva i Okeanografil Atlan-NIRO*), No. 11, p. 4-11 (1964)

Exhibit 67 LPI 841—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 48; 4,168; 249; 3400; 3257; 3401; 301; 315; 313; 317; 3420; 303; 335; 640; 3403; 3408; 3406; 3422; 3398.

Exhibit 68 LPI 46—Copy of certified copy of oyster lease map of South Pass and East Bay

Exhibit 69 LPI 846—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 52; 49; 43; 50; 2787

Exhibit 70 LPI 842—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 349; 353; 386; 342; 334; 351; 348; 350; 346; 383; 384; 387; 382; 385; 388; 352; 341; 343; 347

Exhibit 71 LPI 839—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 5013 and 4482.

Exhibit 72 LPI 843—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 311; 314; 320

Exhibit 73 LPI 845—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 321; 56; 321; 302; 296; 310

Exhibit 74 LPI 844—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 7053; 7039; 6032; 9337; 8252; 4061; 8251; 8690; 9338

Exhibit 75 LPI 847—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 7164; 4042

Exhibit 76 LPI 848—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 7641; 7175; 11,896; 7095; 7039; 7053

Exhibit 77 LPI 838—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of lease 18,330

Exhibit 78 LPI 840—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 11,639; 11,638; 11,640; 11,-641; 11,637; 11,642; 14,461; 14,240

Exhibit 79 Louisiana Oyster Lease No. 334

Exhibit 80 Louisiana Oyster Lease No. 18330

Exhibit 81 Louisiana Oyster Lease No. 301

Exhibit 82 Louisiana Oyster Lease No. 654

Exhibit 83 Louisiana Oyster Lease No. 5013

Exhibit 84 Louisiana Oyster Lease No. 4482

Exhibit 85 Louisiana Oyster Lease No. 3257

Exhibit 86 LPI 1222—Certified copies of parts of the file of State Mineral Lease 579

Exhibit 87 LPI 1223—Certified copies of parts of the file of State Mineral Lease 580

Exhibit 88 LPI 1221—Certified copies of parts of the file from State Mineral Lease 335

Exhibit 89 LPI 1220—Certified copies of documents comprising parts or portions of the file, State Mineral Lease 195

Exhibit 90 LPI 1219—Certified copies of documents comprising parts of the file, State Land Lease 192

Exhibit 91 LPI 1218—Certified copies of documents comprising parts or portions of the file of the State Mineral Lease 188

Exhibit 92 LPI 1217—Certified copies of excerpts from index book at the State Land Office of Louisiana pertaining to State Mineral Lease Nos. 188, 192, 195, 335, 579 and 580

Exhibit 93 LPI 1170 through 1176 as follows:
LPI 1170—Plat of T. 22 and 23 S., R. 32 E., Louisiana Meridian, approved Sept. 25, 1875
LPI 1171—Plat of T. 22 S., R. 32 E. Louisiana Meridian, approved December 8, 1842
LPI 1172—Plat of T. 21 and 22 S., R. 19 E. St. Helena meridian, approved July 16, 1832
LPI 1173—Plat of T. 24 S., R. 32 and 33 E. Louisiana meridian, approved Sept. 25, 1875
LPI 1174—Plat of T. 22 S., R. 31 E., Louisiana meridian, approved December 8, 1842
LPI 1175—Plat of T. 24 S., R. 30 and 31 E., Louisiana meridian, approved May 18, 1842
LPI 1176—Plat of T. 23 S., R. 31 and 32 E. Louisiana meridian, approved Dec. 8, 1842

Exhibit 94 LPI 1184—Copy of quadrangle map entitled "South Pass Quadrangle"

Exhibit 95 LPI 1064—This is a map which reflects information concerning areas affected by mineral leases granted by the State of Louisiana as reflected by the records of the Louisiana State Mineral Board since the period of the creation of that Board. It pertains to East Bay.

Exhibit 96 LPI 1065—This exhibit reflects the same sort of information as does the

exhibit bearing Louisiana Preliminary Identifying Number 1064, except that it pertains to the Caillou Bay area

Exhibit 97 LPI 1025—Map showing outer limit of areas claimed as the minimum extent of inland waters Louisiana would be entitled to under issues 1A through E

Exhibit 98 LPI 1027—Maps and other materials showing location of Inland Water Lines designated and defined under the Act of February 19, 1895

Exhibit 99 LPI 53—Copy of Chart No. 194, Edition 8, date, September, 1901.

Exhibit 100 LPI 899—U. S. Department of the Interior, Geological Survey, November, 1950, Mid Continent Map No. 1603

Exhibit 101 LPI 901—U. S. Department of the Interior, Geological Survey; October, 1950, Mid Continent Map No. 1607, Ship Shoal Area

Exhibit 102 LPI 900—Map showing lease block locations in Ship Shoal Area

Exhibit 103 LPI 898—Map showing lease block locations in South Pass area

Exhibit 104 LPI 1059—This exhibit contains a collection of cartographic materials relating to the Ascension-Barataria Bay area 7 and 10 of the statement of issues. It shows possible overlarge

closing lines and related contentions of Louisiana, plus alternative contentions of Louisiana within this area; and related data

Exhibit 105 Page 2 of Biennial Report of State Mineral Board dated June, 1950

Exhibit 106 LPI 336—Report of John Jay to the President of Congress from Madrid, May 26, 1780, letter dated May 11, 1780, pp. 722-725

Exhibit 107 LPI 337—Communications of the Honorable the French Minister to a Committee of Congress at a Second Conference, February 2, 1780, pp. 488-490

Exhibit 108 LPI 335—Proceedings of Congress as to conditions of pacification and particularly as to the Mississippi and Fisheries, February 23, 1779, pp. 58-61

Exhibit 109 LPI 338—Congress—Proceedings as to the Conditions of Pacification and particularly as to the Mississippi and the Fisheries, September 17, 1779, pp. 324-326

Exhibit 110 LPI 340—Vol. IV, John Jay to the President of Congress, November 6, 1780, excerpt pp. 134-138

Exhibit 111 LPI 339—Vol. IV, Letter of Benjamin Franklin to John Jay, October 2, 1780, pp. 74-76

Exhibit 112 LPI 341—Vol. IV, John Jay to the

President of Congress, October 3, 1781, excerpt pp. 742-745

Exhibit 113 LPI 348—*The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. Mr. Madison to Charles Pinckney, November 27, 1802, pp. 1058-1059

Exhibit 114 LPI 351—*The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. The Purchase of Louisiana, January 1803, pp. 370-374

Exhibit 115 LPI 345—*American State Papers, Documents, Legislative and Executive, of the Congress of the United States*, from the 1st Session of the 1st to the 3rd Session of the 13th Congress, inclusive: commencing March 3, 1789 and ending March 3, 1815. Walter Lowrie, & Matthew St. Clair Clarke, eds., Foreign Relations, Vol. II, Washington: Published by Gale & Seaton, 1832, No. 18 France

and Spain—Louisiana 7th Congress, 2nd Session Robert R. Livingston to the Secretary of State No. 3, January 7, 1802, pp. 536-537. Footnote in book: "The date should, no doubt, be 1803."

Exhibit 116 LPI 355—H. A. Washington, *The Writings of Thomas Jefferson, Volume IV*, Taylor & Maury, (1854) pp. 456-460. Letter to M. Dupont, February 1, 1803.

Exhibit 117 LPI 354—Treaty for the Cession of Louisiana, April 30, 1803, 8 Stat. 200-7.

Exhibit 118 LPI 352—*The Debates and Proceedings of the Congress of the United States*, Eleventh Congress, Third Session, December 3, 1810 to March 3, 1811, Washington: Gales & Seaton, 1853. "An act to enable the people of the Territory of Orleans to form a constitution and State Government, and for the admission of such State into the Union, on an equal footing with the original states and for other purposes," pp. 1326-8

Exhibit 119 LPI 353—*The Debates and Proceedings of the Congress of the United States*, Twelfth Congress, First Session, November 4, 1811 to July 6, 1812, Washington: Gales & Seaton, 1853. "An act for the admission of the State of Louisiana into the Union

and to extend the laws of the U. S. to the said State," pp. 2264-2266

Exhibit 120 Map 4 of 8 of the Set of 54 maps

Exhibit 120-A Map 5 of 8 of the Set of 54 maps

Exhibit 120-B Map 6 of 8 of the Set of 54 maps

Exhibit 121 Photograph album of Curtis L. Buttorff, containing the following series of photographs:

Description of Louisiana Exhibit 121—Series of Photographs

1. 902-22; LPI 992; Corps of Engineers; 3 October 1929
   902-68; LPI 994; Corps of Engineers; 3 October 1929
2. INO-1-157; Corps of Engineers; 14 October 1940
3. 20V311RWM1063; United States Exhibit; 1 October 1946
4. M-17-88-3; Corps of Engineers; 5 June 1949
5. 724-193; United States Exhibit; 1 July 1954
6. 24-116; LPI 537; Corps of Engineers; 29 February 1956
7. L596; C. & G. S.; 23 October 1956
8. L6948; C. & G. S.; 11 October 1958
9. 144; LPI 544; Corps of Engineers; 8 November 1959
10. L8728; C. & G. S.; 30 November 1959
11. L9121; C. & G. S.; 7 December 1959
12. 0932; C. & G.S.; 23 October 1956

13. 61; LPI 546; Corps of Engineers; 13 October 1960
    62; LPI 547; Corps of Engineers; 13 October 1960
14. 112; LPI 550; Corps of Engineers; 17 October 1961
15. 75; Corps of Engineers; 23 November 1962
16. 5-1032; Corps of Engineers; 18 September 1965
17. S8995; C. & G.S.; 8 October 1965
18. 6-12; Source unknown; 23 February 1967
19. 59-61; LPI 562; Corps of Engineers; 15 November 1969
20. E4977; C. & G. S.; 30 January 1970
21. 4873; C. & G.S.; 24 January 1970
22. 8181R; C. & G. S.; 24 January 1970
23. 8281R; C. & G. S.; 30 January 1970

Exhibit 121-A Dr. James P. Morgan overlay of Figure 2 from Exhibit 6

Exhibit 121-B Photos—Stereo Partners, as follows:

Louisiana Exhibit 121B—Series of Photographs

1. INO-1-158; Corps of Engineers
2. 24 January 1970; L8182R; C. & G. S.
3. 30 January 1970; E4976; C. & G. S.
4. 30 November 1959; L8727; C. & G. S.
5. 7-59-145; Corps of Engineers; LPI 545
6. 30 January 1970; L8280R; C. & G. S.
7. 15 November 1969; 59-64; Corps of Engineers; LPI 564

8. 6-61-113; Corps of Engineers; LPI 551
9. 23 October 1956; L595; C. & G. S.
10. 9-60-61; Corps of Engineers; LPI 546
11. 1 October 1946; 21V311RWM1063 16PS 6P183
12. 18 September 1965; 5-1031; Corps of Engineers
13. 12-62-74; Corps of Engineers
14. 29 February 1956; 24-115 P-55; Corps of Engineers; LPI 536
15. 1-7-54; 724-192; Corps of Engineers
16. 8 October 1965; S8996; C. & G. S.
17. 1-7-54; 724-192; Corps of Engineers

Exhibit 122 1895 Chart No. 194

Exhibit 123 LPI-1144, Depositions of Dr. A. Joseph Wraight and Mr. James F. Richardson

E X H I B I T S

W-1 October 3, 1969, letter to Mr. Frederick W. Ellis from Wraight
RW-2 May 26, 1969, Chart No. 1272 (with markings)
R-1 October 29, 1935, Chart No. 1272, see Exh. 164
R R-2 H-6172
R R-3 H-6513
R R-4 H-6492 (copy of portion)
R R-5 H-6492 (film 1:30,000)
R R-6 T-5407
R R-7 May 26, 1969, Chart No. 1272 (clean)

Exhibit 124 December 6, 1969, edition of Chart No. 1272

Exhibit 125 LPI 1010—Copy of letter and report from Mr. Leo W. Hough, State of Louisiana, Department of Conservation, Louisiana Geological Survey, dated July 31, 1970

Exhibit 126 Drilling Activity in East Bay and Caillou Bay before Interim Agreement of October 12, 1956

Exhibit 127-A C. & G. S. Photo No. L-9090, 7 December 1959

Exhibit 127-B C. & G. S. Photo No. L-9091, 7 December 1959

Exhibit 127-C C. & G. S. Photo No. L-9092, 7 December 1959

Exhibit 128-A C. & G. S. Photo No. L-8987, 3 December 1959

Exhibit 128-B C. & G. S. Photo No. L-8988, 3 December 1959

Exhibit 129-A C. & G. S. Photo No. L-9031, 3 December 1959

Exhibit 129-B C. & G. S. Photo No. L-9032, 3 December 1959

Exhibit 129-C C. & G. S. Photo No. L-9033, 3 December 1959

Exhibit 129-D C. & G. S. Photo No. L-9034, 3 December 1959

Exhibit 130 Affidavit by Mr. Frank J. Williams

identifying Sheet 38 of Louisiana Exhibit 21

Exhibit 131 Overlay of right inset on Chart No. 1272 introduced as Exhibit 8

Exhibit 132 Illustrative sketch of seasonal mud-lump growth process

Exhibit 133 LPI 1057—Alternative methods of planimetering area of an indentation are graphically illustrated on this exhibit

Exhibit 134 LPI 1198—Photo Mosaic—Copies of documents in connection with our answers and objections to the First Formal Interrogatories of the United States and the related Requests for Admissions in globo

Exhibit 134-A Mosaic 21

Exhibit 134-B Mosaic 22

Exhibit 134-C Mosaic 23

Exhibit 134-D Mosaic 24

Exhibit 134-E Mosaic 25

Exhibit 134-F Mosaic 26

Exhibit 135 LPI 360—Samuel H. Lockett, *Louisiana As It Is*. Baton Rouge: Louisiana State University Press (1969). The original manuscripts of this geological survey were written in 1876 and 1891.

Exhibit 136 LPI 1011 - Copy of picture of Southwest Pass on wall at Lou-

isiana State University School of Geoscience

Exhibit 137 LPI 55 - Copy of a letter from the Liddell (Moses St. John R. and Family) Papers in the Department of Archives and Manuscripts of Louisiana State University

Exhibit 138 LPI 56 - Copy of page from the "Daily Picayune" of Thursday morning, August 14, 1856, obtained from Library of Louisiana State University

Exhibit 139 LPI 57 - Copy of page from the "Daily Picayune" of Friday morning, August 15, 1856, obtained from Library of Louisiana State University

Exhibit 140 LPI 58 - Copy of page from the "Daily Picayune" of Saturday morning, August 16, 1856, obtained from Library of Louisiana State University

Exhibit 141 LPI 59 - Copy of page from the "Daily Picayune" of Saturday morning, August 16, 1856, obtained from Library of Louisiana State University

Exhibit 142 LPI 60 - Copy of page from the "Daily Picayune" of Monday afternoon, August 18, 1856, obtained from Library of Louisiana State University

Exhibit 143	LPI 61 - Copy of page from the "Daily Picayune" of Wednesday morning, August 20, 1856, obtained from Library of Louisiana State University
Exhibit 144	LPI 62 - Copy of page from the "Daily Picayune" of Wednesday morning, August 20, 1856, obtained from Library of Louisiana State University
Exhibit 145	LPI 1146 - Deposition of Mr. Samuel J. Nunez
Exhibit 146	LPI 1148 - Deposition of Mr. Chin D. Hoy
Exhibit 147	LPI 1149 - Deposition of Mr. Abraham Schouest
Exhibit 148	LPI 1144 - Deposition of Mr. Samuel Von Lubbe
Exhibit 149	LPI 1147 - Deposition of Mr. Landry Cheramie
Exhibit 150	All of Louisiana's Requests for Admissions and Interrogatories and Answers thereto directed to the United States.
Exhibit 151	LPI 903 - Pertinent parts of 1887 map of the Alluvial Valley of the Mississippi River
Exhibit 152	LPI 358 - *Sovereignty of the Sea*, U. S. Department of State, Geographic Bulletin No. 3 (April, 1965)

Exhibit 153	LPI 359 - *Sovereignty of the Sea*, U. S. Department of State, Geographic Bulletin No. 3, rev. (October, 1969)
Exhibit 154	LPI 1132 - Whiteman, *Digest of International Law*, Vol. 4, U. S. Dept. State No. 7825 (April, 1965)
Exhibit 155	LPI 1142 - U. S. Coast & Geodetic Survey Chart No. 1
Exhibit 156	LPI 1137 - Willard Bascom, WAVES AND BEACHES: THE DYNAMICS OF THE OCEAN SURFACE, Doubleday & Co., Inc. (1964)
Exhibit 157	LPI 897 - Map of Survey of the United States Coast, Section VIII, made in 1853 by F. H. Gerdes
Exhibit 158	LPI 1 - Nautical Chart No. 94, 3rd Edition, Published June, 1877, by U.S.C.&G.S.
Exhibit 159	LPI 2 - Nautical Chart No. 194, 13th Edition, Published December 20, 1918, by U.S.C.&G.S.
Exhibit 160	LPI 3 - Nautical Chart No. 194, 15th Edition, Published November 19, 1924, by U.S.C.&G.S.
Exhibit 161	LPI 4 - Nautical Chart No. 1272, 1st Edition, Published February 12, 1925, by U.S.C.&G.S.
Exhibit 162	LPI 5 - Nautical Chart No. 1272, 3rd Edition, Published January 11, 1933, by U.S.C.&G.S.

Exhibit 163 LPI 6 - Nautical Chart No. 1272, 5th Edition, Published September 28, 1934, by U.S.C.&G.S.

Exhibit 164 LPI 7 - Nautical Chart No. 1272, 6th Edition, Published October 29, 1935, by U.S.C.&G.S.

Exhibit 165 LPI 8 - Nautical Chart No. 1272, 7th Edition, Published April 1, 1944, by U.S.C.&G.S.

Exhibit 166 LPI 9 - Nautical Chart No. 1272, 9th Edition, Published March 31, 1947, by U.S.C.&G.S.

Exhibit 167 LPI 10 - Nautical Chart No. 1272, 9th Edition, Published August 22, 1955, by U.S.C.&G.S.

Exhibit 168 LPI 11 - Nautical Chart No. 1272, 9th Edition, Published September 17, 1956, by U.S.C.&G.S.

Exhibit 169 LPI 52 - Copy of Chart No. 94, Edition 1, date, 1873

Exhibit 170 LPI 54 - Copy of Chart No. 194, Edition 10, dated July, 1910

Exhibit 171 LPI 291 - Photostatic copy of Connelly Field Notes

Exhibit 172 LPI 292 - Letter from Mr. Seymour Lowman, Assistant Secretary of the Treasury to the Secretary of State, dated June 4, 1929

Exhibit 173 LPI 1214 - Edward W. Orton, "A Geological Study of Marsh Island, Iberia Parish, Louisiana," Technical Report of Louisiana Wild Life and Fisheries Commission (1959)

Exhibit 173-A Attachments to Exhibit 173 - LPI 1214

Exhibit 174 LPI 293 - 1940, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 294 - 1941, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 295 - 1942, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 296 - 1943, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 297 - 1944-1945, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 298 - 1946, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 299 - 1947, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 300 - 1948, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 301 - 1949, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 302 - 1950, Chart No. 2, p. 5 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 303 - 1951, Chart No. 2, p. 5 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 304 - 1952, Chart No. 4, p. 7 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 305 - 1953, Chart No. 4, p. 10 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 306 - 1954, Chart No. 4, p. 10 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 307 - 1955, Chart No. 4, p. 9 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 308 - 1956, Chart No. 190, p. 158 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 309 - 1957, Chart No. 195, p. 158 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 310 - 1958, Chart No. 200, p. 160 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 311 - 1959, Chart No. 206, p. 160 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 312 - 1960, Chart No. 206, p. 160 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 313 - 1961, Chart No. 212, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 314 - 1962, Chart No. 220, p. 170 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 315 - 1963, Chart No. 226, p. 173 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 316 - 1964, Chart No. 228, p. 169 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 317 - 1965, Chart No. 232, p. 168 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 318 - 1966, Chart No. 242, p. 171 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 319 - 1967, Chart No. 252, p. 174 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 320 - 1968, Chart No. 245, p. 167 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 321 - 1969, Chart No. 243, p. 163 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

Exhibit 175

LPI 322 - 1956, Chart No. 192, p. 159 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 323 - 1957, Chart No. 197, p. 159 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 324 - 1958, Chart No. 202, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 325 - 1959, Chart No. 207, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 326 - 1960, Chart No. 208, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 327 - 1961, Chart No. 214, p. 162 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 328 - 1962, Chart No. 222, p. 171 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 329 - 1963, Chart No. 228, p. 174 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 330 - 1964, Chart No. 230, p. 170 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 331 - 1965, Chart No. 234, p. 169 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

	LPI 332 - 1966, Chart No. 244, p. 172 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*
	LPI 333 - 1967, Chart No. 254, p. 175 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*
	LPI 334 - 1968, Chart No. 248, p. 169 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*
Exhibit 176	LPI 1212 - G. Etzel Pearcy, "Measurement of the United States Territorial Sea," *Department of State Bulletin*, No. 1044 (June 29, 1959)
Exhibit 177	LPI 1131 - E. L. Corthell, *A History of the Jetties at the Mouths of the Mississippi River*, New York: John Wiley and Sons, 2d ed. (1881).
Exhibit 178 (Accession file)	LPI 918 - File from records of United States Coast & Geodetic Survey treated in 1 Shalowitz *Shore & Sea Boundaries*
Exhibit 178-A	Copies of correspondence re Acc. File
Exhibit 179	Pages 503 through 507 of Humphrey and Abbot, Appendix A
Exhibit 180	LPI 1055 - This exhibit also pertains to East Bay and contains data and measurement information

	associated with various maps of the period 1918 through the 1960's. The various components of the exhibit also reflect alternative natural entrance points and measurement data related to certain land forms not treated in the exhibit identified by Louisiana Preliminary Identifying No. 1054
Exhibit 181-A	Chart 1272, 21st Edition
Exhibit 181-B	Chart 1273, 9th Edition
Exhibit 181-C	Chart 1274, 10th Edition
Exhibit 181-D	Chart 1275, 1970 Edition
Exhibit 182-A	LPI 73 - Color Photograph - Photo No. TL-13 dated June 26, 1969
Exhibit 182-B	LPI 74 - Color Photograph - Photo No. TL-14 dated June 26, 1969
Exhibit 182-C	LPI 83 - Color Photograph - Photo No. T-36 dated June 26, 1969
Exhibit 182-D	LPI 86 - Color Photograph - Photo No. TL-39 dated June 26, 1969
Exhibit 182-E	LPI 94 - Color Photograph - Photo No. TL-51 dated June 26, 1969
Exhibit 182-F	LPI 101 - Color Photograph - Photo No. TL-65 dated August 27, 1969
Exhibit 182-G	LPI 103 - Color Photograph - Photo No. TL-83 dated August 27, 1969
Exhibit 182-H	LPI 106 - Color Photograph - Photo No. TL-97 dated August 27, 1969

Exhibit 182-I	LPI 107 - Color Photograph - Photo No. TL-99 dated August 27, 1969
Exhibit 182-J	LPI 108 - Color Photograph - Photo No. TL-100 dated August 27, 1969
Exhibit 182-K	LPI 109 - Color Photograph - Photo No. TL-101 dated August 27, 1969
Exhibit 182-L	LPI 110 - Color Photograph - Photo No. TL-102 dated August 27, 1969
Exhibit 182-M	LPI 111 - Color Photograph - Photo No. TL-113 dated August 27, 1969
Exhibit 182-N	LPI 114 - Color Photograph - Photo No. TL-116 dated August 27, 1969
Exhibit 182-O	LPI 115 - Color Photograph - Photo No. TL-117 dated August 27, 1969
Exhibit 182-P	LPI 126 - Color Photograph - Photo No. TL-136 dated August 27, 1969
Exhibit 182-Q	LPI 130 - Color Photograph - Photo No. TL-142 dated August 27, 1969
Exhibit 182-R	LPI 138 - Color Photograph - Photo No. TL-193 dated September 3, 1969
Exhibit 182-S	LPI 139 - Color Photograph - Photo No. TL-196 dated September 3, 1969
Exhibit 182-T	LPI 141 - Color Photograph - Photo No. TL-202 dated September 3, 1969
Exhibit 182-U	LPI 142 - Color Photograph - Photo No. TL-204 dated September 3, 1969

Exhibit 182-V	LPI 153 - Color Photograph - Photo No. TL-217 dated September 3, 1969
Exhibit 182-W	LPI 155 - Color Photograph - Photo No. TL-219 dated September 3, 1969
Exhibit 182-X	LPI 156 - Color Photograph - Photo No. TL-220 dated September 3, 1969
Exhibit 182-Y	LPI 157 - Color Photograph - Photo No. TL-213 dated September 3, 1969
Exhibit 182-Z	LPI 159 - Color Photograph - Photo No. TL-225 dated September 3, 1969
Exhibit 182-AA	LPI 161 - Color Photograph - Photo No. TL-227 dated September 3, 1969
Exhibit 182-AB	LPI 162 - Color Photograph - Photo No. TL-228 dated September 3, 1969
Exhibit 182-AC	LPI 164 - Color Photograph - Photo No. TL-230 dated September 3, 1969
Exhibit 182-AD	LPI 165 - Color Photograph - Photo No. TL-231 dated September 3, 1969
Exhibit 182-AE	LPI 166 - Color Photograph - Photo No. TL-232 dated September 3, 1969
Exhibit 182-AF	LPI 169 - Color Photograph - Photo

	No. TL-241 dated September 3, 1969
Exhibit 182-AG	LPI 171 - Color Photograph - Photo No. TL-244 dated September 3, 1969
Exhibit 182-AH	LPI 172 - Color Photograph - Photo No. TL-245 dated September 3, 1970
Exhibit 182-AI	LPI 173 - Color Photograph - Photo No. TL-246 dated September 3, 1969
Exhibit 182-AJ	LPI 174 - Color Photograph - Photo No. TL-247 dated September 3, 1969
Exhibit 182-AK	LPI 179 - Color Photograph - Photo No. TL-264 dated October 2, 1969
Exhibit 182-AL	LPI 181 - Color Photograph - Photo No. TL-266 dated October 2, 1969
Exhibit 182-AM	LPI 609 - Photograph - TL-O(32) 2 dated June 24, 1967, Jetties at mouth of Belle Pass outlet of Bayou LaFourche
Exhibit 182-AN	LPI 610 - Photograph - TL-O(34) 1 dated June 24, 1967, Ground view showing exhumed marsh in retreating beach area, Timbalier Island, Louisiana
Exhibit 182-AO	LPI 953 - Photograph by Dr. James P. Morgan of different parts of the Louisiana coastal area

Exhibit 182-AP	LPI 1005 - Photograph from the files of Dr. James P. Morgan
Exhibit 183	**NOTE: EXHIBIT 183-A THROUGH 183-V WERE WITHDRAWN. THEY APPEAR IN LOUISIANA EXHIBIT 21.**
Exhibit 183-W	LPI 959 - Photograph TL-284 dated October 2, 1969. Different parts of the Louisiana coastal area
Exhibit 183-X	LPI 973 - Photograph TL-299 dated October 2, 1969. Different parts of the Louisiana coastal area
Exhibit 183-Y	LPI 988 - Photograph TL-283 dated October 2, 1969. Different parts of the Louisiana coastal area
Exhibit 183-Z	LPI 991 - Photograph TL-287 dated October 2, 1969. Different parts of the Louisiana coastal area
Exhibit 184-A	LPI 611 - Photograph M-100-8 dated June 26, 1969, View Southwest showing mouth of Pass Tante Phine
Exhibit 184-B	LPI 612 - Photograph M-100-10 dated June 26, 1969, View west showing peninsula extending south toward mouth of Pass Du Bois
Exhibit 184-C	LPI 613 - Photograph M-100-12 dated June 26, 1969, View toward the Northwest showing the west end of Pass Du Bois and the peninsula to the north

Exhibit 184-D LPI 614 - Photograph M-100-13 dated June 26, 1969, View looking southwest along the sand spit on the east side of Southwest Pass, Mississippi Delta

Exhibit 184-E LPI 615 - Photograph M-100-15 dated June 26, 1969, Mouth of South Pass, Mississippi Delta. Sand spit, mudlump islands No. 89-90 and new smaller lumps shown in the foreground View toward the north

Exhibit 184-F LPI 616 - Photograph M-101-4 dated June 26, 1969, South Pass mudlumps and sand spit, Mississippi Delta. Mudlump 93 on left of photo. Mudlump 89-90 in the central part of photo and new mudlumps offshore in right central part of photo. The distinct fresh water-salt water boundary line shown in the foreground

Exhibit 184-G LPI 619 - Photograph M-101-7 dated June 26, 1969, Mouth of Southeast Pass, Mississippi Delta, and mudlump islands in right middle ground. View toward the north.

Exhibit 184-H LPI 620 - Photograph M-101-8 dated June 26, 1969, Balize Peninsula in the background and Balize Bayou mudlumps in the foreground. View looking generally north.

Exhibit 184-I LPI 621 - Photograph M-101-12 dated June 26, 1969, View toward the northwest showing the mouth of Pass A Loutre in the background and Pass A Loutre mudlumps in the foreground

Exhibit 184-J LPI 622 - Photograph M-101-16 dated June 26, 1969, View toward the north, showing a crevasse or splay extending into Blind Bay from the south side of Pass A Loutre, Mississippi Delta

Exhibit 184-K LPI 623 - Photograph M-103-13 dated September 3, 1969, View west showing breaches in the sand spit on the east side of Southwest Pass, Mississippi Delta

Exhibit 184-L LPI 624 - Photograph M-103-16 dated September 3, 1969, View north showing the north end of the sand spit on the east side of Southwest Pass, Mississippi Delta

Exhibit 184-M LPI 625 - Photograph M-104-5 dated September 3, 1969, View toward the northwest showing the marsh on the west side of South Pass, Mississippi Delta. See M-104-6 for comparison.

Exhibit 184-N LPI 626 - Photograph M-104-6 dated September 3, 1969, View northwest showing marsh on the west side of South Pass, Missis-

sippi Delta. Compare with M-104-5

Exhibit 184-O LPI 627 - Photograph M-104-10 dated September 3, 1969, View northeast showing the marsh and natural levees on the west side of South Pass. Note small residual islands in foreground of photograph

Exhibit 184-P LPI 628 - Photograph M-104-11 dated September 3, 1969, Natural levee and marsh along west bank of South Pass, Mississippi Delta. View toward the northeast showing small residual islands in foreground of photograph

Exhibit 184-Q LPI 629 - Photograph M-104-12 dated September 3, 1969, Natural levee and marsh along west bank of South Pass, Mississippi Delta. View toward the northeast showing small residual islands in foreground of photograph

Exhibit 184-R LPI 630 - Photograph M-104-15 dated September 3, 1969, View toward the west showing the mouth of Southwest Pass and sand spit extending into East Bay, Mississippi Delta

Exhibit 184-S LPI 631 - Photograph M-104-16 dated September 3, 1969, View toward the west showing the natural levees of Southwest Pass near its

mouth and the sand spit extending into East Bay, Mississippi Delta. A photograph showing more detail than M-104-15, including breaches in sand spit caused by Hurricane Camille

Exhibit 184-T LPI 632 - Photograph M-105-1 dated October 2, 1969, View toward the south of a portion of Isle Derniere, Terrebonne Parish, Louisiana. The inlet in Isle Derniere shown in the center of the photograph is Coupe Colin

Exhibit 184-U LPI 639 - Photograph M-105-10 dated October 2, 1969, View toward the south showing the marsh and shore line of north shore of Caillou Bay. Note shell material is concentrated in small pockets along the shore line

Exhibit 184-V LPI 641 - Photograph M-105-12 dated October 2, 1969, View toward the north of marsh land extending inland from Isle Derniere. This view is in the opposite direction from M-105-11

Exhibit 184-W LPI 643 - Photograph M-105-16 dated October 2, 1969, View toward the east showing the junction of Bayou Grande Caillou and Bayou du Lac, Terrebonne Parish

Exhibit 184-X LPI 645 - M-53-36

Exhibit 184-Y LPI 646 - M-94-2 dated July 26, 1961

Exhibit 185-A LPI 1058-A This exhibit pertains to shore line changes in the Isle Derniere area for the period 1853 through 1959, as reflected by various maps or surveys of that period

Exhibit 185-B LPI 1058-B - This exhibit pertains to shore line changes in the Caillou Bay-Lake Pelto area for the period 1853 through 1959, as reflected by various maps or surveys of that period

Exhibit 186 LPI 903 - Pertinent parts of 1887 map of the Alluvial Valley of the Mississippi River in overlay form

Exhibit 187 Chart 1050 in overlay form

Exhibit 188-A LPI 1066-A - This exhibit reflects certain island measurement information pertaining to islands and low water elevations in the Derniere area

Exhibit 188-B LPI 1066-B - This exhibit reflects certain island measurement information pertaining to islands and low water elevations in the Shell Keys area.

Exhibit 189 LPI 1063 - This is a collection of reduced scale nautical charts with an index map. The nautical charts included in the exhibit from which the reduced scale copies were made for convenience in handling are charts 1268 through 1277, inclusive.

Exhibit 190 Photograph Album No. 4 of Dr. James P. Morgan, as follows:

LIST OF PHOTOGRAPHS TO ACCOMPANY TESTIMONY OF JAMES P. MORGAN CONCERNING PHYSICAL CHARACTERISTICS OF ISLE DERNIER AND CAILLOU BAY.

(All of the photographs included here were taken by James P. Morgan on the dates indicated).

PART I—COLOR PHOTOGRAPHS

Chronologic Number of Photograph	*Louisiana Preliminary Identifying Number*	*Date of Photography*	*Description of Photograph*
1	606	June 24, 1967	View west down beach of Isle Derniere, Terrebonne Parish, Louisiana.
2	175	October 2, 1969	View north across Trinity Bay, eastern Isle Derniere, Terrebonne Parish, Louisiana.
3	176	October 2, 1969	View north across central Isle Derniere, Caillou Boca in middle ground.
4	177	October 2, 1969	View northward across central Isle Derniere. Caillou Boca in middle ground.

5	978	October 2, 1969	View looking southwest toward western Isle Derniere with Caillou Boca in foreground marshland of old Bayou MiSale extending out toward island.
6	987	October 2, 1969	View looking toward the south of western Isle Derniere. The island is in background, Caillou Boca in foreground.
7	178	October 2, 1969	View northwest across western Isle Derniere. Inlet shown is Coupe Colin. Note new sand spit in forground.
8	183	October 2, 1969	View northwest toward Raccoon Point western Isle Derniere, showing position of new sand spit.
9	607	June 24, 1967	View north toward Coupe Colin opening in Isle Derniere with new sand spit in foreground.
10	964	June 24, 1967	View looking north of western Isle Derniere; new sand spit in foreground; Coupe Colin Inlet in background.
11	608	June 24, 1967	View east along Isle Derniere, Terrebonne Parish, showing new sand spit seaward and west of Coupe Colin beach.

12	180	October 2, 1969	View northeast across western Isle Derniere. Coupe Colin Inlet in right rear of photo. New sand spit in foreground.
13	182	October 2, 1969	View northeast across western Isle Derniere and new sand spit.
14	957	October 2, 1969	View looking southeast showing water boundary line and its relationship to the north shore of Caillou Bay.
15	954	October 2, 1969	View looking toward the northeast showing water boundary in Caillou Bay. Position can be determined from Bayou Goreau in central background.
16	972	October 2, 1969	View looking northeast of north shore of Caillou Bay. Shrimp drying platforms in center of photograph are located near the mouth of Bayou Goreau.
17	975	October 2, 1969	View looking west of north shore Caillou Bay. Shrimp drying platforms on the shore of Bayou Goreau in background.
18	958	October 2, 1969	View looking to the east. East Bay Junop in back-

			ground, Bayou Du West in middle background.
19	950	October 2, 1969	View looking northwest across Pelican Island along north shore of Caillou Bay. East Bay Junop in background, Pelican Pass in right foreground.
20	974	October 2, 1969	View looking north of north shore of Caillou Bay. Stream on left margin of photo is Taylor's Bayou. East Bay Junop in left rear background of photo.
21	187	October 2, 1969	View of north shore of Caillou Bay Terrebonne Parish. Bayou Charbon in right background.
22	186	October 2, 1969	View of north shore of Caillou Bay, Terrebonne Parish. Area west of outlet of Grand Bayou du Large.
23	185	October 2, 1969	View north showing opening of Grand Bayou du Large into Caillou Bay, Terrebonne Parish.
24	184	October 2, 1969	View looking northeast showing northeast shore line of Caillou Bay, Terrebonne Parish.
25	955	October 2, 1969	Another view of water boundary extending out-

			ward into Caillou Bay from north shore of Caillou Bay.
26	1000	October 2, 1969	Water boundary line extending into Caillou Bay from north shore.
27	952	October 2, 1969	Water boundary line extending into Caillou Bay from north shore.
28	969	October 2, 1969	Water boundary line in Caillou Bay extending almost perpendicular to north shore of Caillou Bay. Details of this boundary are shown on additional photos in this series.

PART II—BLACK AND WHITE PHOTOGRAPHS

Chronologic Number of Photograph	*Louisiana Preliminary Identifying Number*	*Date of Photography*	*Description of Photograph*
B & W 1	633	October 2, 1969	View toward the west along Isle Derniere with Raccoon Point in the distance. Coupe Colin Inlet in center of photograph and new sand spit on seaward (left) side of island.
B & W 2	640	October 2, 1969	View toward the south with Isle Derniere in the background. Foreground shows

marsh land surrounding old Bayou MiSale. Caillou Boca separates Isle Derniere from marsh land.

B & W 3	642	October 2, 1969	View south showing the marsh land of old Bayou MiSale. Caillou Boca in foreground and Isle Derniere in background.
B & W 4	636	October 2, 1969	View toward the northwest showing the north shore of Caillou Bay and a foam line indicating a water interface in foreground.
B & W 5	637	October 2, 1969	View toward the east showing the north shore of Caillou Bay. Note the abundant shelly material comprising the beach along the border of the marsh land.
B & W 6	635	October 2, 1969	View toward the east showing the north shore of Caillou Bay with a foam line suggesting a water interface in foreground.
B & W 7	634	October 2, 1969	View toward the northeast showing and the north shore of Caillou Bay and a foam line indicating a water interface in Caillou Bay.
B & W 8	644	October 2, 1969	View toward the east, showing north shore of Caillou Bay. Note decrease in shell towards the east.

B & W 9	638	October 2, 1969	View east of the north shore of Caillou Bay, an area slightly farther to the east than shown on previous photograph (B & W 8) Note lesser amount of shell on beach.

Exhibit 190-A Photo area Index Sheets

Exhibit 191-A LPI 993 - U. S. Army Corps of Engineers Photo No. 902-25 dated October 3, 1929

Exhibit 191-B LPI 995 - U. S. Army Corps of Engineers Photo No. 902-550 dated October, 1929

Exhibit 191-C LPI 996 - U. S. Army Corps of Engineers Photo No. 902-551 dated October, 1929

Exhibit 191-D LPI 997 - U. S. Army Corps of Engineers Photo No. 902-552 dated October, 1929

Exhibit 191-E LPI 998 - U. S. Army Corps of Engineers Photo No. 902-553 dated October, 1929

Exhibit 191-F LPI 999 - U. S. Army Corps of Engineers Photo No. 902-554 dated October, 1929

Exhibit 192 Photograph Album No. 5 of Dr. James P. Morgan, as follows:

LIST OF PHOTOGRAPHS TO ACCOMPANY TESTIMONY OF JAMES P. MORGAN CONCERNING NATURAL ENTRANCE POINTS AT ATCHAFALAYA BAY.

(All of the accompanying photographs were taken on June 6, 1968 by James P. Morgan and previously submitted as part of Exhibit 68, Appendix G, Map Exhibits and Related Materials for Brief of the State of Louisiana in Support of its Motion for Entry of Supplemental Decree No. 2).

Chronologic Number of Photograph	*Photograph Number and Page*	*Description of Photograph*
1	No. 4, Page 1	Point au Fer with North Island lying to its left and with a pronounced oyster reef formation in the foreground. The oyster reef serves as the eastern natural entrance point of Atchafalaya Bay.
2	No. 5, Page 1	Closer view of the oyster reef formation off Point au Fer. North Island can be seen in the background.
3	No. 6, Page 1	Another view from a different angle of the oyster reef off Point au Fer that is the eastern natural entrance point of Atchafalaya Bay.
4	No. 7, Page 1	Looking west at Point au Fer and the reef structures beyond.

5	No. 8, Page 2	Close-up from the ground of the reef formation off Point au Fer that is the eastern natural entrance point of Atchafalaya Bay.
6	No. 10, Page 2	Additional ground photograph of reef formation off Point au Fer.
7	No. 9, Page 2	Another ground photograph of reef formation off Point au Fer. Point au Fer and intervening reef formations can be seen in the background.
8	No. 12, Page 2	Reef formation off Point au Fer with helicopter in the background to show size and extent of reef.
9	No. 13, Page 2	Same reef formation stretching out toward the Gulf of Mexico.
10	No. 15, Page 2	Same reef formation. Looking toward east with Point au Fer and intervening reef formations in the background.
11	No. 11, Page 3	Close-up of oysters and shells on eastern natural entrance point of Atchafalaya Bay. Note that some oysters are up-right or in active growth position. Camera lens case is in photograph to show size.
12	No. 14, Page 3	A part of the reef formation

off Point au Fer showing oysters in active growth position.

13 No. 33, Page 3 Looking northward from just above the western natural entrance point of Atchafalaya Bay. Formations in foreground and winding to right background are islands permanently above high water.

14 No. 31, Page 3 Shell Keys formation, looking northeastward.

15 No. 32, Page 3 Shell Keys again, but looking more nearly due north.

16 No. 34, Page 3 Ground photograph on a Shell Keys island. High-tide line is large ridge in right foreground. Note extent of island to left and rear of photograph.

17 No. 28, Page 4 Some of the reef formations associated with the Shell Keys.

18 No. 25, Page 4 Looking south past Mound Point on Marsh Island toward numerous reef formations leading out to the Shell Keys.

19 No. 30, Page 4 Looking east at reef formations that form a natural barrier blocking entrance into Atchafalaya Bay in this vicinity. Marsh Island is on the left.

20 No. 29, Page 4 Looking west along the shoreline of Marsh Island showing

reef formations extending toward the Shell Keys.

21 No. 26, Page 4 Looking south from Marsh Island down the reef formations and Shell Keys.

22 No. 24, Page 4 Looking south at the western headland Louisiana employs in Atchafalaya Bay. Because the Shell Keys are farther than twenty-four miles from the eastern natural entrance point, Louisiana moves the closing line in to this point. The line Louisiana describes is not quite twenty-four miles long because the shoreline of Marsh Island turns slightly northward just to the right of the point to which Louisiana closes.

Exhibit 192-A Index Map to Volume 5

Exhibit 193-A LPI 535 - U. S. Corps of Engineers Photograph dated February 29, 1956 - P-55, 24-114

Exhibit 193-B LPI 538 - U. S. Corps of Engineers Photograph dated October 29, 1957 - X-2, 550

Exhibit 193-C LPI 539 - U. S. Corps of Engineers Photograph dated October 29, 1957 - X-2, 551

Exhibit 193-AB LPI 572 - U. S. Corps of Engineers Photograph dated November 15, 1969 - 59-111

Exhibit 193-AA LPI 571 - U. S. Corps of Engineers Photograph dated November 15, 1969 - 59-109

Exhibit 193-Y LPI 569 - U. S. Corps of Engineers Photograph dated November 15, 1969 - 59-107

Exhibit 193-X LPI 568 - U. S. Corps of Engineers Photograph dated November 15, 1969 - 59-105

Exhibit 193-AN LPI 584 - U. S. Corps of Engineers Photograph dated November 20, 1969 - 60-4

Exhibit 193-AM LPI 583 - U. S. Corps of Engineers Photograph dated November 20, 1969 - 60-3

Exhibit 194 (Evidence) LPI 1062 - This exhibit pertains to the Atchafalaya Bay complex. It shows natural entrance point and measurement information.

Exhibit 195 LPI 1163 - 24 pages of descriptive notes by Dr. James P. Morgan pertaining to various photographs

Exhibit 196 LPI 917 - Gerdes Map (two pages)

Exhibit 197 LPI 1056 - This display employs base maps, at a reduced scale from the Set of 54 maps, to reflect natural entrance points analyses and measurement data for various pronounced land forms in East Bay

Exhibit 198 This collection of illustrative display materials shows Louisiana closing

line contentions, primary and alternative, for the Caillou Bay area. It also reflects measurement information

Exhibit 199 LPI 1211 - Relevant portions of a map prepared by G. Etzel Pearcy using U.S.C. & G.S. Chart No. 1275 as a base map, at a reduced scale with notes thereon showing color information not reflected by the originals. This map was obtained by Louisiana by the Department of State through the United States Department of Justice.

Exhibit 199-A Same as Exhibit 199, showing colored lines

Exhibit 200 LPI 1213 - Same description as Louisiana Preliminary Identifying No. 1211, except the base map is U. S. C. & G. S. Chart No. 1272

Exhibit 200-A Same as Exhibit 200, showing colored lines

Exhibit 201 Map 2 of 8 of the Set of 54 maps

Exhibit 202 LPI 1068 - U. S. C. & G. S. air photo compilation No. T 5295

Exhibit 203 LPI 1067 - U.S.C. & G.S. air photo compilation No. T5291

Exhibit 204 LPI 905 - U.S.C. & G.S. map H-6492

Exhibit 205 LPI 906 - U.S.C. & G.S. map H-6172

Exhibit 206 LPI 907 - U.S.C. & G.S. map No. 3630

Exhibit 207 LPI 908 - U.S.C. & G.S. map No. 2752

Exhibit 208	LPI 909 - U.S.C. & G.S. map No. 1762
Exhibit 209	LPI 910 - U.S.C. & G.S. map No. 1763
Exhibit 210	LPI 911 - U.S.C. & G.S. map No. 4038
Exhibit 211	LPI 912 - U.S.C. & G.S. map No. 4044
Exhibit 212	LPI 913 - U.S.C. & G.S. map No. 4050
Exhibit 213	LPI 914 - U.S.C. & G.S. map No. T-5403
Exhibit 214	LPI 915 - U.S.C. & G.S. map T-5407
Exhibit 215	LPI 916 - U.S.C. & G.S. map 1691
Exhibit 216	LPI 904 - U.S.C. & G.S. map H-6513
Exhibit 217 A-E	U. S. Army Corps of Engineers maps, in 5 sheets, entitled "Passes of the Mississippi River, La." from photos-aerial surveys made in 1922 and 1929
Exhibit 218 A-F	La. Ex. 1-6; Photographs by Mr. David Morgan of Isle Derniere
Exhibit 219	Overheads from Mr. David Morgan's presentation; figure 1
Exhibit 220	Figure 49; Shalowitz
Exhibit 221	Figure 50; Shalowitz
Exhibit 222	Monterey Bay - Depth of penetration methods and data

Exhibit 223	Monterey Bay - Depth of penetration methods - construction of median line for depth of penetration measurement in Monterey Bay
Exhibit 224	Figure 3 of Mr. David Morgan's depth of penetration memo
Exhibit 225	Figure 4 of Mr. David Morgan's depth of penetration memo
Exhibit 226	Figure 5 of Mr. David Morgan's depth of penetration memo
Exhibit 227	Mr. David Morgan's sketch of fjords
Exhibit 228	Monterey Bay - Method B
Exhibit 229	Mr. David Morgan's Bay Penetration data
Exhibit 230	LPI 1182, a study prepared by Mr. David J. Morgan entitled, "Measurement of Penetration Ratio"
Exhibit 231	Mr. David Morgan's Bucket Bend Bay work map
Exhibit 232	Mr. David Morgan's Caillou Bay work map
Exhibit 233	Mr. David Morgan's West Bay work map
Exhibit 234	Mr. David Morgan's East Bay work map
Exhibit 235	Mr. David Morgan's Norway fjord work map
Exhibit 236-A	Chart 1276, 12th edition
Exhibit 236-B	Chart 1277, 13th edition

Exhibit 237-A	Chart 1274, 10th edition
Exhibit 237-B	Chart 1272, 1970 edition
Exhibit 237-C	Chart 1273 of attachment, 5th edition
Exhibit 238	Talcott map, 1839
Exhibit 239	1918 chart 194
Exhibit 240	1901 chart 194
Exhibit 241	1873 chart 194
Exhibit 242	9th edition, chart 1272 with addenda
Exhibit 243	January 1933, chart 1272
Exhibit 244	April, 1944, chart 1272
Exhibit 245	October 1935, chart 1272
Exhibit 246	February, 1925, chart 1272
Exhibit 247	LPI 1231 - Gauld map sketch
Exhibit 248	Map 2 of 8
Exhibit 249-A	Mr. Philip L. Whitaker's field books (1 of 2)
Exhibit 249-B	Mr. Philip L. Whitaker's field books (2 of 2)
Exhibit 250-A	1198, prel. plat
Exhibit 250-B	1012, signed plat, showing mudlumps at South Pass
Exhibit 251	Geodimeter notes, 1198
Exhibit 252	1014-1023, copy of notes by Mr. Philip L. Whitaker on back of photos numbered 1014-1023
Exhibit 253	Tidal Bench Marks, South Pass

Exhibit 254	LPI 1013, Letter from Harland R. Cravat, Chief, Technical Planning and Operations Branch, Photogrammetry Division, U. S. Department of Commerce, Environmental Science Services Administration, Coast and Geodetic Survey, to Frederick W. Ellis dated August 20, 1970 file #C141
Exhibit 255	Methods of planimetering furnished Mr. Philip L. Whitaker by Mr. David Morgan
Exhibit 256-A	LPI 63 - Copy of portions of a 1911 map of the State of Louisiana issued for the Railroad Commission of Louisiana as a supplement to its twelfth annual report
Exhibit 256-B	LPI 64 - Copy of portions of a map entitled "New Commercial and Census Map of Louisiana" copyrighted in 1917
Exhibit 256-C	LPI 65 - Copy of portions of a map entitled "Post Route map of the State of Louisiana", filed in the map Division of the Library of Congress June 18, 1903
Exhibit 256-D	LPI 66 - Copy of a portion of a map of the State of Louisiana published by the Department of the Interior and compiled from the official records of the General Land Office and other sources under the direction of I. P. Berthong in 1916

Exhibit 257 Joint 1962 agreement

Exhibit 258 LPI 1165 - Map compiled under the direction of I. P. Berthong in 1916, from the official records of the General Land Office and other sources, showing the State of Louisiana, and being a published map from the records of the General Land Office of the Department of the Interior

Exhibit 259 LPI 342 - Message of President Jefferson, 9th Congress, 2nd Session, No. 25, pp. 68-69 (December 2, 1806)

Exhibit 260 LPI 343 - Message of President Jefferson, 8th Congress, 1st Session, No. 21 pp. 61-63 (October 17, 1803)

Exhibit 261 LPI 344 - Report of the Secretary of State, Thomas Jefferson, 2nd Congress, 1st Session, No. 59 (March 7, 1792)

Exhibit 262 LPI 346 - *Journals of the Continental Congress, 1774-1789*, edited from the original records in the Library of Congress by John C. Fitzpatrick, Vol. IIII, 1786, August 1 - December 31 U.S.G.P.O., Washington, 1934. Tuesday, August 29, 1786, pp. 574-596

Exhibit 263 LPI 347 - *The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session,

from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. James Madison, Secretary of State to Robert R. Livingston, May 1, 1802, pp. 1027-1028

Exhibit 264 LPI 349 - *The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session, from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. Mississippi Question, February 23, 1803, pp. 151-154

Exhibit 265 LPI 350 - *The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session, from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. Mississippi Question, February 1803, pp 231-234

Exhibit 266 LPI 356 - Executive Documents & Reports Committees, 27th Congress, 1st Session. Doc. #9, Ho. of Rep., March 6, 1841, Resolution, of the State of La., for a steamship of war to be built on the waters of the Mississippi

Exhibit 267 LPI 357 - Executive Documents &

Reports Committees, 27th Congress, 1st Session. Doc #10, Ho. of Rep., June 12, 1840, Resolution of the Legislature of La. asking that the fortifications at the mouths of the Mississippi be completed and mounted.

Exhibit 268 December, 1932 edition of chart 198

Exhibit 269 October, 1925 edition of chart 1272

Exhibit 270 1937 edition of map of Louisiana - Official Map of Louisiana, first edition

Exhibit 271 April, 1924 edition of chart 194

Exhibit 272 March 1916 edition, which is a reissue of June 1914 edition of chart 194

Exhibit 273 June, 1914 edition of chart 194

Exhibit 274 LPI 1169 - Hardee's Official Map of Louisiana dated 1895

Exhibit 275 October, 1911 edition of chart 194

Exhibit 276 Sketch of waves by F. W. Ellis

Exhibit 277 Chart No. 1272, 23rd Ed., May 1969

Exhibit 278 I.L.C. No. 8 lease, 1956

Exhibit 279 Outer Continental Shelf "Hearings Before A Special Sub-Committee," December 17, 1969, Janaury 22, March 4, pp. 202-208

Exhibit 280 Mr. Stevenson's Speech

Exhibit 281 Dr. Alexander Melamid's published articles from the *Professional Geographer*, with letter to Mr. Jonathan Charney

Exhibit 282 Dr. Alexander Melamid's published articles from the *Oil Forum*, with letter to Mr. Strauss

Exhibit 283 General Documentary Materials, as follows:

LOUISIANA EXHIBIT NO. 283

GENERAL DOCUMENTARY MATERIALS

INDEX

Tab No.	*L.P.I. No.*	*Description*
1	1232	A letter from Robert D. Hodgson to Mr. Jonathan Charney, dated February 2, 1971, with enclosures consisting of letter from Robert D. Hodgson to Commander P. B. Beazley, dated March 31, 1970, and a letter from Commander P. B. Beazley to Dr. Robert D. Hodgson dated May 27, 1970.
2	1233	Part III of *The Law of Territorial Waters* from the Harvard Studies of International Law, Reporter, George Grafton Wilson.
3	1234	A letter from Mr. D. A. McDougal of the office of the Legal Adviser of the Department of State to Mr. Hackworth, dated June 26, 1934, enclosing a memorandum dated June 25, 1934 pertaining to the extent of control that a state may exercise over its territorial waters.

4 1235 A letter from R. S. Patton, Director of the United States Coast and Geodetic Survey, to Samuel W. Boggs of the State Department dated March 3, 1930, enclosing suggestions regarding the three-mile limit or parts thereof pertaining to bays and islands, together with copy of a letter dated March 22, 1930, to Captain Patton from S. W. Boggs, dateline at the Hague, The Netherlands.

5 1237 A letter to Mr. Hackworth from S. W. Boggs dated April 6, 1931, on the letterhead of the Department of State of the office of the Historical Adviser with enclosures pertaining to sundry charts which were the subject of the letter and which were published for the United States Tariff Commission.

6 1238 A letter to Mr. Miller from the Acting Secretary of the Department of State dated February 27, 1930.

6-A 1238 Enclosure with a draft proposal for the League of Nations Hague Conference dated March 17, 1930, showing proposals presented by the Norwegian and Swedish delegations.

7 1299 Copy of memorandum from the Solicitor of the Department of the Interior to the Secretary of the Interior dated Otcober 1, 1954, from records of the Department of the Interior.

8 1300 A group of copies of documents from the records of the American delegation to the

Conference for the Codification of International Law held at the Hague in 1930 consisting of:

(a) A memorandum on the subject of territorial waters dated March 6, 1930 with annotations of the record copy to the effect that the memorandum was to be handed to the Secretary in London, but instead, Mr. Miller talked to the Secretary.

(b) Proposals presented by the Norwegian and Swedish Delegations to Committee II on Bases 3 and 4; 6, 7, and 8.

(c) Amendments proposed by the Delegation of the United States pertaining to Bases of discussion 1, 3, 4, 5, and 6.

(d) A memorandum by S. W. Boggs dated March 22, 1930, pertaining to an interview with a Captain Luymes.

(e) Proposals presented by the Norwegian and Swedish Delegations upon bases of discussions 3 and 4, 6, 7, and 8. (Note, this is apparently the same item described under (b) above except for annotations or marginalia appearing on (b).)

9 1301 A group of documents from records of the Department of State in the National Archives described as follows:

Copies of a group of documents from:

(a) A memorandum from the Legal Adviser of the Department of State to Mr. S. W. Boggs dated March 6, 1935 with the im-

print of the Office to the Geographer of the Department of State.

(b) A memorandum on stationery of the Department of State from "SWB," presumably, S. W. Boggs, to a Mr. Vallance, dated March 7, 1935.

(c) A memorandum dated March 11, 1935 initialed, "W.R.V." from the office of the Legal Adviser of the Department of State stamped with the receipt stamp of the office of the Geographer of the Department of State addressed to Mr. Boggs.

(d) A memorandum from the office of the Historical Adviser of the Department of State dated March 14, 1935 to Mr. Vallance with annotation or marginalia initialed "S.W.B."

(e) A draft with marginalia on the original of a letter to the Secretary of the Interior from the Secretary of State showing initials of "S.W.B." and others.

(f) Another draft of a letter proposed to be sent to the Secretary of the Interior by the Secretary of State bearing initials of "S.W.B." and other persons pertaining to a response to a letter of February 27, 1936. Similar in content to the next preceding letter except that the hand-written additions or annotations thereon (from the originals) differ, this copy having crossed out five lines on the first page, and the preceding draft (item (f) above) having proposed

certain additional language now apparently incorporated in this typed draft.)

(g) A copy of the letter dated March 22, 1935 which was forwarded to the Secretary of the Interior by the Assistant Secretary of State for the Secretary of State in response to The Secretary of the Interior's letter of February 27, 1935.

10 1302 A copy of the *North Atlantic Coast Fisheries Case* between Great Britain and the United States with related documents as reported in the *Hague Court Reports* on pages 142 through 225, inclusive. Handwritten marginalia on the first sheet of the copy are not from the original but are merely file number designations.

11 1303 Copy of the *Fisheries Case* (*United Kingdom v. Norway*) from the records of the International Court of Justice for the year 1951. (Note: the marginalia are from the hand of an unknown past reader of the report and are not submitted.)

13 1477 Bulletin Number Four, Coastal Studies Institute of Louisiana State University. See Technical Report 76: "Effects of Hurricane Camille on the Landscape of the Breton-Chandeleur Island Chain"

14 1482 Executive Order issued by Theodore Roosevelt concerning the declaration of bird preserves for certain islands including Breton Island, dated November 11, 1905.

15 1483 Executive Order issued by Theodore Roosevelt concerning the decalaration of bird pre-

serves for certain islands including Breton Island, dated October 4, 1904.

16 1516 A copy of the transcript of the hearing before the Committee on Foreign Relations, United States Senate, Eighty-Sixth Congress, Second Session concerning *Conventions of the Law of the Sea.*

17 1520 Decision, *Post Office vs. Estuary Radio, Ltd.* Opinion, *Regina vs. Kent Justices.*

18 1549 a & b (a) Letter from President John Quincy Adams to the House of Representatives of the United States dated Washington, 15th January, 1828.

(b) Letter from Henry Clay, Secretary of State, dated January 14, 1828, referred to by President Adams.

19 1008 Copy of letter from Gulf Oil Corporation Law Department (Melvin Evans) dated June 24, 1968, with documents referred to therein.

20 Documents relating to Louisiana's Motion of April, 1970 for publication of documents, together with Responses by the United States.

21 1538 This is a group of documents pertaining to methods of delimitation under the proposal at the Hague Conference in 1930 and other documents pertaining to Tariff Commission Studies all attached to a certification by one Jane F. Smith dated March 2, 1971

Exhibit 284	Deposition of Mr. Christopher Dobard.
Exhibit 284-A	Exhibits to Deposition of Mr. Christopher Dobard.
Exhibit 285	LPI 1526, an exhibit showing straight baselines designated by the United States, its agencies or responsible officials, around parts of the Mississippi Delta area.
Exhibit 286	LPI 1525, an exhibit pertaining to the Caillou Bay region showing straight baselines designated by the United States, its agencies or responsible officials.
Exhibit 287-A-H	1:250,000 AMS Q 501 series maps of Bristol Bay area:
A	4-1 (Goodnews)
B	4-3 (Dillingham)
C	4-4 (Hagemeister Island)
D	4-5 (Nushagak)
E	4-6 (Naknek)
F	4-8 (Bristol Bay)
G	4-9 (Ugashik)
H	4-11 (Chignik)
Exhibit 288	LPI 1274, map labeled Bristol Bay, reference number 3, 4 series 1301, edition 1-AMS, scale 1:1,000,000.
Exhibit 289	LPI 1273, overlay of Delta por-

tion of map labeled Mobile, reference number NH 16, series 1301, edition 1-AMS, scale 1:1,000,000.

Exhibit 290 Johnston's Readyfold Coloured Touring Map.

Exhibit 290-A Film overlay of portion of this map.

Exhibit 291 Sheet 12, map of England S.E. and London - Thames Estuary.

Exhibit 292 Map - East Anglia.

Exhibit 293 Larimore's work map, chart 1272, August 15, 1970 ed., showing planimetry areas within the Mississippi River, South Pass and Southwest Pass. Also markings by James P. Morgan.

Exhibit 294 LPI 1273, map labeled Mobile, reference number NH 16, series 1301, ed. 1-AMS scale 1:1,000,000.

Exhibit 295 LPI 1283, portion of delta area of map labeled Breton Sound, sheet numbered NH 16-7, 1:250,000.

Exhibit 295-A Overlay of above map, exhibit 295.

Exhibit 296 East Bay planimetry information on 24th edition (December 6, 1969) and 25th edition (August 15, 1970) U. S. C. & G. S. nautical chart No. 1272.

Exhibit 297 LPI 1521, an exhibit showing application of the Boggs Reduced Area formula to Monterey Bay and Atchafalaya Bay showing that the

formula was never recognized by law since these bays were adjudicated to be bays acquired by the states in the 19th century.

Exhibit 298 LPI 1298, Enlargement of "Figure 6.—Semicircular rule applied to San Diego Bay, using reduced area method." from 1 *Shalowitz* 39 (1962).

Exhibit 299 LPI 1517, East Bay Shoreline, January 24, 1970 from Coast and Geodetic Survey Color Photography Curtis Buttorff interpretation.

Exhibit 300 LPI 1524, an exhibit showing interpretation of 1954 aerial photography by Mr. Curtis Buttorff, former United States closing lines and modified water gap information, all pertaining to additional low water line information in the vicinity of Isle Derniere.

Exhibit 301 Overlay of the South Pass sheet. (Map 4 of 8 coverage at scale of 1:20,000 and on which Buttorff interpreted East Bay shore line.)

Exhibit 302 LPI 1271, photograph, Ammann identifying No. 727-124, dated 1/7/54.

Exhibit 303 LPI 1270, photograph, Ammann identifying No. 727-123, dated 1/7/54.

Exhibit 304 LPI 1269, photograph, Ammann

identifying No. 727-122, dated 1/7/54.

Exhibit 305 LPI 1268, photograph, Ammann identifying No. 727-121, dated 1/7/54.

Exhibit 306 LPI 1267, photograph, Ammann identifying No. 727-120, dated 1/7/54.

Exhibit 307 LPI 1266, photograph Ammann identifying No. 727-119, dated 1/7/54.

Exhibit 308 LPI 1265, photograph, Ammann identifying No. 727-118, dated 1/7/54.

Exhibit 309 LPI 1264, photograph, Ammann identifying No. 727-38, dated 1/7/54.

Exhibit 310 LPI 1263, photograph, Ammann identifying No. 726-96, dated 1/8/54.

Exhibit 311 LPI 1293, photograph, Ammann identifying No. 727-197, dated 1/8/54.

Exhibit 312 LPI 1292, photograph, Ammann identifying No. 727-177, dated 1/8/54.

Exhibit 313 LPI 1291, photograph, Ammann identifying No. 727-176, dated 1/8/54.

Exhibit 314 LPI 1290, photograph, Ammann

identifying No. 727-175, dated 1/8/54.

Exhibit 315 LPI 1289, photograph, Ammann identifying No. 727-144, dated 1/7/54.

Exhibit 316 LPI 1288, photograph, Ammann identifying No. 727-135, dated 1/7/54.

Exhibit 317 LPI 1287, photograph, Ammann identifying No. 727-134, dated 1/7/54.

Exhibit 318 LPI 1286, photograph, Ammann identifying No. 727-133, dated 1/7/54.

Exhibit 319 LPI 1285, photograph, Ammann identifying No. 727-126, dated 1/7/54.

Exhibit 320 LPI 1284, photograph, Ammann identifying No. 727-125, dated 1/7/54.

Exhibit 321 LPI 1304, photo mosaic obtained from Ammann International Corp. compiled from photos of Jack Ammann Photogrammetric Engineers, Inc. based upon 1954 aerial photography employed in preparation of the Set of 54 maps, sheet L 39.

Exhibit 322 LPI 1305, photo mosaic obtained from Ammann International Corp, compiled from photos of Jack Ammann Photogrammetric Engineers, Inc., based upon 1954 aerial photo-

graph employed in preparation of the Set of 54 maps, sheet L 40.

Exhibit 323 Natural Entrance point alternative at South Pass at various tide stages. Location 1, overlay, made by Curtis Buttorff at National Ocean Survey.

Exhibit 324 George H. Lauff, ed., *Estuaries*, American Association for the Advancement of Science, No. 83 (1967).

Exhibit 325 LPI 1478, map of Yarmouth-Windsor area of Nova Scotia, published by Canadian government showing bay of Fundy and St. Mary's Bay area LPI 1479, map labeled Church Point N. S., 21 B/8 West half, first edition;

LPI 1480, map labeled Church Point, N. S., 21 B/8 East Half, first edition;
LPI 1481, map labeled Digby, N. S., 21 A/12 West Half, second edition, all dealing with St. Mary's Bay.

Exhibit 326 1886 Chart of Breton Island Sound

Exhibit 327-A Map 20 of 41, Buttorff work sheet of Isle Derniere, analyzing Ammann photos.

Exhibit 327-B Map 19 of 41, Buttorff work sheet of Isle Derniere, analyzing Ammann photos.

Exhibit 328 LPI 1463, David Morgan's index to photos taken along South Pass and showing artificial maintenance of openings by Corps of Engineers (sheet 4 of 8).

Exhibit 329 Photograph Album Vol. 3 of Dr. James P. Morgan, concerning artificial maintenance of openings between South Pass and East Bay (for rebuttal).

LIST OF PHOTOGRAPHS TO ACCOMPANY REBUTTAL TESTIMONY OF JAMES P. MORGAN CONCERNING ARTIFICIAL MAINTENANCE OF OPENINGS BETWEEN SOUTH PASS, MISSISSIPPI RIVER, AND EAST BAY

(The following photographs illustrate artificially maintained openings from South Pass of the Mississippi River into East Bay. The photographs depict openings on the west bank of South Pass consecutively from south to north. Figure 1, pages 1 through 5 (LPI #1463) accompanying the photographs, indicates the position of each photographed opening. All photographs were taken by David J. Morgan unless otherwise indicated.)

Chronologic Number of Photograph	*Louisiana Preliminary Identifying Number*	*Date of Photography*	*Description of Photographs*
1	1420	February 23, 1971	View west of opening shown on Fig. 1, page 1.

2	1414	February 23, 1971	View west of opening shown on Fig. 1, page 1.
3	1406	February 23, 1971	View west of opening shown on Fig. 1, page 1.
4	1405	February 23, 1971	View west of opening shown on Fig. 1, page 1.
5	1425	February 23, 1971	View west of U.S. Coast Guard Light Station. (Fig. 1, pages 1 and 2)
6	1418	February 23, 1971	View west of opening shown on Fig. 1, page 2.
7	1417	February 23, 1971	View west of opening shown on Fig. 1, page 2.
8	1416	February 23, 1971	View west of opening shown on Fig. 1, page 2.
9	1396	February 23, 1971	View west of opening shown on Fig. 1, page 2.
10	1415	February 23, 1971	View west of opening shown on Fig. 1, page 2.
11	1397	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
12	1365	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
13	1419	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
14	1404	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
15	1362	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.

			Photograph by James P. Morgan
16	1361	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3. Photograph by James P. Morgan
17	1351	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
18	1350	February 23, 1971	View west of Oysterville Light and opening to west shown on Fig. 1, page 3. Photograph by James P. Morgan
19	1375	February 23, 1971	View west of opening immediately north of Oysterville Light shown on Fig. 1 page 3.
20	1360	February 23, 1971	View west of opening shown on Fig. 1, page 3.
21	1376	February 23, 1971	View west of opening shown on Fig. 1, page 3.
22	1359	February 23, 1971	View west of opening shown on Fig. 1, page 3. Photograph by James P. Morgan
23	1366	February 23, 1971	View northwest of opening shown on Fig. 1, pages 3 and 4. Photograph by James P. Morgan
24	1403	February 23, 1971	View northwest of opening shown on Fig. 1, pages 3 and 4.

25	1422	February 23, 1971	View west of opening shown on Fig. 1, pages 4 and 5.
26	1421	February 23, 1971	View northwest of opening shown on Fig. 1, pages 4 and 5.
27	1423	February 23, 1971	Detail of rip-rap at opening shown on Fig. 1, pages 4 and 5.
28	1373	February 23, 1971	View west of rip-rap controlled opening shown on Fig. 1, pages 4 and 5.
29	1372	February 23, 1971	View west of rip-rap controlled opening shown on Fig. 1, pages 4 and 5.
30	1371	February 23, 1971	View west of rip-rap controlled opening shown on Fig. 1, pages 4 and 5.
31	1401	February 23, 1971	View west of rip-rap blocking opening shown on Fig. 1, page 5.
32	1402	February 23, 1971	View west of rip-rap controlled opening shown on Fig. 1, page 5.
Exhibit 330			Photograph album of Mr. David J. Morgan of Isle Derniere area.

DESCRIPTION OF PHOTOGRAPHS AND RELATED LOCATION MAPS CONCERNING THE ISLE DERNIERE AREA

(All photographs taken by David J. Morgan unless otherwise annotated)

Chronologic Number of Illustration	*Louisiana Preliminary Identifying Number*	*Date of Photograph or Publication*	*Description of Photograph or Illustration*
1			Index map of Isle Derniere area showing location of Figures 1-5.
2			Figure 1 - portion of Cocodrie Quadrangle, 7.5 minute series showing approximate locations of photographs taken in that vicinity.
3	1256	September 5, 1970	View NNW of marsh vegetation in vicinity of Pass La Poule in Lake Pelto.
4	1261	September 5, 1970	View NE of marsh vegetation in vicinity of Pass La Poule in Lake Pelto.
5	1532		Figure 2 - Portion of sheet 18 of 41 of the Set of 54 Maps showing approximate locations of photographs taken in that vicinity.
6	1239	September 5, 1970	Wave action in Lake Pelto - view northward.

7	1245	September 5, 1970	Wave action in Lake Pelto - view northward.
8	1242	September 5, 1970	Remnant of Bobwin Point, former distributary in Lake Pelto. View N.
9	1262	September 5, 1970	View southward down west side of pinnacle of land extending northward to the west of Old Camp Pass.
10	1243	September 5, 1970	Pinnacle of land extending northward west of Old Camp Pass, looking NE.
11	1260	September 5, 1970	Detail of organic clay composing land in rear of island; exhumed vegetation in background.
12	1259	September 5, 1970	View facing south down pinnacle of land at rear of island to the west of Old Camp Pass.
13	1232		Figure 3 - portion of sheet 19 of 41 of the Set of 54 Maps showing the approximate position of photographs taken in that vicinity.
14	1252	September 5, 1970	View looking south at vegetation characteristics at rear of island.
15	1248	September 5, 1970	View looking south at boat traffic in Caillou Bay. Isle Derniere in background.

16	1544	March 13, 1971	View looking west at peninsula in Bay Round vicinity, north of Isle Derniere. (James P. Morgan)
17	1545	March 13, 1971	Vegetation characteristics on peninsula in Bay Round vicinity. (James P. Morgan)
18	1546	March 13, 1971	Vegetation characteristics on peninsula in Bay Round vicinity. (James P. Morgan)
19	1547	March 13, 1971	Vegetation characteristics on peninsula in Bay Round vicinity. (James P. Morgan)
20	1532		Figure 4 - portion of sheet 19 of 41 of the Set of 54 Maps showing the approximate positions of photographs taken in that vicinity.
21	1244	September 5, 1970	View of north shore of Caillou Bay showing vegetation characteristics. View eastward.
22	1532		Figure 5 - portion of sheet 20 of 41 of the Set of 54 Maps showing the approximate position of photographs taken in that vicinity.
23	1251	September 5, 1970	View looking north at exhumed island vegetation mud flat to the west of Coupe Colin.

24	1249	September 5, 1970	View NE across Coupe Colin at fishing camp on second island.
25	1253	September 5, 1970	View NE across Coupe Colin at fishing camp on second island.
26	1247	September 5, 1970	View loking ESE at back of westernmost island of Isle Derniere.
27	1250	September 5, 1970	View southward of westernmost island of Isle Derniere showing mangrove and other vegetation. (With D. J. Morgan)
28	1246	September 5, 1970	View southward of westernmost island of Isle Derniere showing mangrove and other vegetation. (With F. W. Ellis)
29	1255	September 5, 1970	View SW down rear of westernment island of Isle Derniere.
30	1258	September 5, 1970	Bateau on beach at rear of westernmost island approaching Raccoon Point. Exhumed marsh in foreground. View looking east.
31	1240	September 5, 1970	View looking east down westernmost island showing general characteristics of the island. Gulf of Mexico is to the extreme right.

32	1254	September 5, 1970	View looking northward showing vegetation characteristics-Caillou Bay in background.
33	1255	September 5, 1970	View looking west down westernmost island showing vegetation and general characteristics. Caillou Bay to right and Gulf to left.
34	1241	September 5, 1970	View looking west down beach of westernmost island of Isle Derniere. Gulf of Mexico to left.

Exhibit 331 A through E	LPI 1548, hand-written summary report of David Morgan concerning comparison of the shapes and areas of water gap and island configurations in the Isle Derniere area plus annexed Xerox copies of map information.
Exhibit 332 A and B	LPI 1484, record of the United States Coast and Geodetic Survey of the Department of Commerce showing hourly heights of tides at Eugene Island, Louisiana, dated February 5, 1954 for the period January 1 through January 14, referenced to a datum of 1.6 feet below mean low water.
Exhibit 333-A	LPI 1294, statement by E. T. Oliver, Jr., dated February 18, 1971, concerning the records of Ammann In-

ternational Corporation and predecessor firms being in his custody.

Exhibit 333-B LPI 1295, film record card of Jack Ammann Photogrammetric Engineers, numbered 726, referred to in LPI No. 1294.

Exhibit 333-C LPI 1296, film record card of Jack Ammann Photogrammetric Engineers, numbered 727, referred to in LPI No. 1294.

Exhibit 333-D LPI 1297, statement from E. T. Oliver, Jr. of information obtained from original file record cards, statement dated February 18, 1971, and originally attached to LPI No. 1294.

Exhibit 334 LPI 1485, a document entitled, "Summary of Tide Information pertaining to 1954 Ammann Photography in the Isle Derniere Area."

Exhibit 334-A Drawing by David Morgan regarding tide information derived from the Eugene Island gauge.

Exhibit 335 LPI 1518, a sketch prepared to graphically reflect wind direction information presented in testimony of Mr. Arthur I. Cooperman.

Exhibit 336 Mylar overlay of 24th edition of chart 1272, December 1969, delimiting areas for planimetry.

Exhibit 337 Mylar overlay of 25th edition of chart 1272, August, 1970, delimiting areas for planimetry.

Exhibit 338 Sketch by David Morgan illustrating scale problems on maps.

Exhibit 339 Work sheets showing data for 45-degree test in the Caillou Bay area (in comparison with United States Exhibit 355).

Exhibit 340 Photograph Album Vol. 1 of Dr. James P. Morgan, concerning mudlumps, South Pass sand spit, and Bucket Bend Bay area.

LIST OF PHOTOGRAPHS TO ACCOMPANY THE REBUTTAL TESTIMONY OF JAMES P. MORGAN CONCERNING PHYSICAL CHARACTERISTICS OF MISSISSIPPI DELTA MUDLUMPS, SOUTH PASS SAND SPIT AND BUCKET BEND BAY AREA

(All of the Photographs included here were taken by James P. Morgan unless otherwise indicated.)

PART I—COLOR PHOTOGRAPHS

Chronologic Number of Photograph	*Louisiana Preliminary Identifying Number*	*Date of Photography*	*Description of Photographs*
1	1434	February 21, 1971	River silt and "mainland" vegetation on mudlump at Southeast Pass. View northwest.
2	1452	February 21, 1971	Buck brush and isolated clumps of Roseau on South-

			east Pass mudlump. View north.
3	1429	February 21, 1971	Vegetation including Roseau on west (bayside) of Southeast Pass mudlump. View north.
4	1450	February 21, 1971	Rangia clams (indicative of marshland lakes) on Southeast Pass mudlump.
5	1445	February 21, 1971	Feces of coypu (nutria) in Bermuda grass on Southeast Pass mudlump.
6	1345	February 21, 1971	Very shallow water between Southeast Pass mudlumps indicated by significant waves generated over short fetch between islands. View north.
7	1369	February 22, 1971	Flock of terns disturbed on Pass a Loutre mudlumps. View north.
8	1367	February 22, 1971	Mudlumps off mouth of Pass a Loutre. View west.
9	1379	February 22, 1971	Mudlump islands off mouth of South Pass. View northeast. Photo by David J. Morgan.
10	1380	February 22, 1971	Mudlump islands off mouth of South Pass. View northeast. Photo by David J. Morgan.

11	1378	February 22, 1971	Mudlump islands off mouth of South Pass. View north Photo by David J. Morgan.
12	1377	February 22, 1971	Dr. Morgan collecting fossils from South Pass mudlump 89-90; being watched by Mr. Ellis. Photo by David J. Morgan.
13	1431	February 22, 1971	Fire ant mount on South Pass mudlump 89-90. Photo by David J. Morgan.
14	1441	February 23, 1971	Feces of coypu (nutria) on mud-cracked surface of South Pass mudlump 93.
15	1432	February 23, 1971	Feces of coypu (nutria) around mud puddle on mudlump 89-90. Photo taken by David J. Morgan.
16	1476	February 23, 1971	Telephoto view of South Pass Coast Guard Station and sand spit. View northeast. (No. 1 of a 7-photo panorama.)
17	1473	February 23, 1971	Telephoto view of South Pass Coast Guard Station and sand spit. View north. (No. 2 of a 7-photo panorama.)
18	1470	February 23, 1971	Telephoto view of South Pass Coast Guard Station and sand spit. View north. (No. 3 of a 7-photo panorama.)

19	1474	February 23, 1971	Telephoto view of South Pass Coast Guard Station and sand spit. View north. (No. 4 of a 7-photo panorama.)
20	1471	February 23, 1971	Telephoto view of South Pass Coast Guard Station and sand spit. View north. (No. 5 of a 7-photo panorama.)
21	1472	February 23, 1971	Telephoto view of South Pass Coast Guard Station and sand spit. View northwest (No. 6 of a 7-photo panorama.)
22	1475	February 23, 1971	Telephoto view of South Pass Coast Guard Station and sand spit. View northwest. (No. 7 of 7-photo panorama.)
23	1512	March 6, 1971	Mouth of South Pass showing sand spit which has reformed since Hurricane Camille and mudlumps in distance. View southwest.
24	1510	March 6, 1971	Mouth of South Pass showing sand spit which has reformed since Hurricane Camille. Mudlumps in distance. View north.
25	1509	March 6, 1971	Mouth of South Pass showing sand spit which has reformed since Hurricane Camille. Mudlumps in distance. View east.

26	1437	February 23, 1971	Vegetation surrounding pond on South Pass mudlump 93. View southwest.
27	1382	February 23, 1971	Mud vent discharging brine into pond on South Pass mudlump 93. View southeast.
28	1438	February 23, 1971	Vegetation surrounding pond on South Pass mudlump 93. View northwest.
29	1496	March 6, 1971	View west toward the interior of Cubits Crevasse area north of Bucket Bend Bay.
30	1495	March 6, 1971	View west toward the interior of Cubits Crevasse area north of Bucket Bend Bay. Area immediately south of Photo No. 29.
31	1497	March 6, 1971	View toward southwest of Bucket Bend Bay.
32	1493	March 6, 1971	View toward southwest of Bucket Bend Bay.
33	1491	March 6, 1971	View toward southwest of Bucket Bend Bay. Pass a Loutre in the background.
34	1499	March 6, 1971	View west of Bull Bay (inner part of Bucket Bend Bay) and Paddy Bay. Pass a Loutre to left of photo.

35	1487	March 6, 1971	View north of Paddy Bay at upper end of Bucket Bend Bay. Pass a Loutre in left foreground.
36	1486	March 6, 1971	View to the northeast of Bucket Bend Bay and opening into Gulf.
37	1515	March 6, 1971	Marsh area south of Bucket Bend Bay. Mud flats reflect tide stage.
38	1514	March 6, 1971	Marsh area south of Bucket Bend Bay. Mud flats reflect tide stage.

PART II—BLACK AND WHITE PHOTOGRAPHS

Chronologic Number of Photograph	*Louisiana Preliminary Identifying Number*	*Date of Photography*	*Description of Photographs*
B & W 1	1307	March 6, 1971	Aerial view to northeast of Paddy Bay (foreground), Bull Bay (middle ground), and Gulf in Bucket Bend Bay area.
B & W 2	1465	March 6, 1971	Aerial view to the southwest showing Bucket Bend Bay area with Pass a Loutre in distance.
B & W 3	1468	March 6, 1971	Aerial view to the southwest showing Bucket Bend Bay area with Pass a Loutre in distance.

B & W 4	1469	March 6, 1971	View to the southwest showing ship entering South Pass with sand spit and mudlump islands in distance.

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Exhibit 341 Photograph album, Vol. 2 by Dr. James P. Morgan, concerning Joseph Bayou area.

LIST OF PHOTOGRAPHS TO ACCOMPANY THE REBUTTAL TESTIMONY OF JAMES P. MORGAN CONCERNING THE PHYSICAL CHARACTERISTICS OF THE JOSEPH BAYOU AREA, EAST BAY MISSISSIPPI DELTA

(All of the photographs included here were taken by James P. Morgan unless otherwise indicated.)

PART 1 - COLOR PHOTOGRAPHS

Figure 1 - Index Map showing photograph directions and locations by LPI Number.

Chronologic Number of Photograph	*Louisiana Preliminary Identifying Number*	*Date of Photography*	*Description of Photographs*
1	1357	February 22, 1971	View north from Joseph Bayou showing levees in foreground and dredged spoil in distance.
2	1346	February 22, 1971	View northeast from Joseph Bayou showing levees in

			foreground and dredged spoil in distnace.
3	1347	February 22, 1971	View east from Joseph Bayou across levee.
4	1355	February 22, 1971	View east across Joseph Bayou levee.
5	1356	February 22, 1971	View southeast down Joseph Bayou and left bank natural levee.
6	1353	February 22, 1971	View northeast across Joseph Bayou natural levee (middle ground) showing Roseau clumps in distance.
7	1354	February 22, 1971	View north from canal in Joseph Bayou area. See attached map (Fig. 1) for location.
8	1408	February 22, 1971	Well location in Joseph Bayou canal. See Fig. 1 for location.
9	1407	February 22, 1971	Well location in Joseph Bayou canal. See Fig. 1 for location.
10	1411	February 22, 1971	View northwest from Joseph Bayou canal showing crew boat in another canal in distance. See Fig. 1 for location.
11	1410	February 22, 1971	Deteriorating marshland in Joseph Bayou area. View

			north. See Fig. 1 for location.
12	1409	February 22, 1971	View northwest across deteriorating marshland in Joseph Bayou area. See Figure 1 for location.
13	1400	February 22, 1971	View southeast out mouth of Joseph Bayou into East Bay. See Fig. 1 for location.
14	1413	February 22, 1971	View northwest of Roseau marshland of Joseph Bayou area. See Fig. 1 for location.
15	1394	February 22, 1971	View north of Roseau marshland near mouth of Joseph Bayou. See Fig. 1 for location.
16	1398	February 22, 1971	View north of Roseau marshland near mouth of Joseph Bayou. See Fig. 1 for location.
17	1457	February 22, 1971	Mr. Ellis standing in Roseau clump at mouth of Joseph Bayou. See Fig. 1 for location. Photo by David J. Morgan.
18	1459	February 22, 1971	Mr. Ellis standing in Roseau clump at mouth of Joseph Bayou. See Fig. 1 for location. Photo by David J. Morgan.
19	1458	February 22, 1971	Mr. Ellis standing in Roseau clump at mouth of Joseph

			Bayou. See Fig. 1 for location. Photo by David J. Morgan.
20	1456	February 22, 1971	Mr. Ellis showing result of standing in Roseau clump at mouth of Joseph Bayou. Photo by David J. Morgan.
21	1381	February 22, 1971	Mr. Ellis showing result of standing in Roseau clump at mouth of Joseph Bayou. Photo by David J. Morgan.
22	1539	March 6, 1971	Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background.
23	1540	March 6, 1971	Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background.
24	1541	March 6, 1971	Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background.
25	1542	March 6, 1971	Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background.
26	1543	March 6, 1971	Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background.

PART II - BLACK AND WHITE PHOTOGRAPHS

Chronologic Number of Photograph	*Louisiana Preliminary Identifying Number*	*Date of Photography*	*Description of Photograph*
B & W 1	1326	February 22, 1971	Part of a 3-photo panorama (LPI #1523A) showing Joseph Bayou area; same region as shown on Fig. 1.
B & W 2	1327	February 22, 1971	Part of a 3-photo panorama (LPI #1523A) showing Joseph Bayou area; same region as shown on Fig. 1.
B & W 3	1328	February 22, 1971	Part of a 3-photo panorama (LPI #1523A) showing Joseph Bayou area; same region as shown on Fig. 1.
B & W 4	1329	February 22, 1971	Detail of Roseau marshland at the mouth of Joseph Bayou. View east (same location as LPI #1381, Fig. 1)
B & W 5	1340	February 22, 1971	Mr. Ellis standing in Roseau at the mouth of Joseph Bayou. View east (same location as LPI #1381, Fig. 1).

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Exhibit 342 LPI 1523-B, panorama of Dr. Morgan's photos of tombolo at South Pass.

Exhibit 343 LPI 1523-A, black and white panorama of Joseph Bayou area.

Exhibit 344 LPI 1522, an exhibit reflecting hydrographic information pertaining to the Pass a Loutre area. (colored)

Exhibit 345 Mylar film of map 2 of 8, North Pass, Pass a Loutre, to overlay exhibit 344.

Exhibit 346 Mylar film of map of Southeast Pass mudlumps, map 3 of 8, at reduced scale (approximately 1:30,000) to overlay Louisiana Exhibit 216.

Exhibit 347 Mylar film of mouth of South Pass from map 4 of 8 at reduced scale (approximately 1:30,000) to overlay Louisiana Exhibit 216.

Exhibit 348 Memo of area in acres of Mississippi River below Venice by Larimore.

Exhibit 349 *Water Borne Commerce of the United States*, Corps of Engineers, pp. 179-80 (1967)

Exhibit 350 *Water Borne Commerce of the United States*, Corps of Engineers, pp. 181-82 (1968)

Exhibit 351 *Water Borne Commerce of the United States*, Corps of Engineers, pp. 189-90 (1969)

Exhibit 352 Brief Exhibit 70-118, appendix G. of Louisiana Brief before the Supreme Court. Harbor works to show channel depths (Corps of Engineers).

Exhibit 353 Three-mile projection plotted on reduced scale Set of 54 Maps (w/documents from Louisiana Answers to Second Interrogatories affixed to front cover)

Exhibit 353-A Computer printout of three-mile projection (done by Louisiana State University) (w/one-page attachments).

Exhibit 354 B-G Norwegian maps

Exhibit 355 The *In Camera* documents; Confidential documents; no copy allowed.

Exhibit 356 (a) Letter from Solicitor General Perlman to Boliver E. Kemp, Jr., Attorney General for the State of Louisiana, dated March 16, 1951. This letter has been introduced in evidence as U. S. Exhibit No. 341.

(b) The copies of the United States Coast and Geodetic Survey Charts Nos. 1115 and 116 upon which was delineated the line showing the general location of the landward boundary of the offshore area claimed by the United States, which were attached to the letter by Mr. Philip B. Perlman, Solicitor General, to the Honorable Boliver E. Kemp, Jr., dated March 16, 1951.

(c) Letter from Solicitor General Perlman to Boliver E. Kemp, Jr., At-

torney General of the State of Louisiana, dated June 12, 1951

(d) Letter from Solicitor General Perlman to Boliver E. Kemp, Jr., Attorney General of the State of Louisiana, dated June 26, 1951.

(e) Letter from Secretary of State Seward to Gabriel Tassara, Spanish Minister, dated August 10, 1863, which appears in 1 Moore *Digest of International Law*, 1906, p. 711.

(f) Hall *International Law* 8th Edition, 1917, pages 126, 127.

(g) Senate Document No. 162, 58th Congress, 2d Session, pages 239-240; page 221, pages 224 to 228 and pages 15 and 16, and Volume 4, Part I, Counter Case of the United States, pages 131-132; Volume 5, Part I, Argument of the United States, pages 14-18; Volume 7, pages 605-611, pages 543-548.

APPENDIX II, Part 3

INDEX TO THE EVIDENCE INTRODUCED BY THE UNITED STATES IN THE PROCEEDING BEFORE WALTER P. ARMSTRONG, JR., SPECIAL MASTER

Exhibit 1	Descriptive Report, Planimetric and Mean-Low Water Line Mapping Projects PH-5903 and 20,000-819 Part I - Mississippi River Delta, T-10944 to T-10957
Exhibit 2	Compilation Report, Mississippi Delta, Louisiana Map Numbers T-10944 through 10957, Bureau of Land Management Numbers 1 through 8
Exhibit 3	Reprint from the International Hydrographic Review, Vol. XXXVIII, No. 1, January 1961, Mapping the Low-Water Line of the Mississippi Delta
Exhibit 4	Descriptive Report, Shoreline and Mean-Low Water Line Mapping - Project 20,000-819 Part II—T11993-T-11997, Atchafalaya Bay
Exhibit 5	Hand held photographs taken during 1960-1961 Atchafalaya Bay Survey and Descriptive Area Maps
Exhibit 6	Aerial Photographs Nos.: L8606 - L8612, L9036, L9035, L9034, L9033, L9032, L9031, L9030, L9029, L8703, L8704, L9003, L9002, L9001

Field Inspection Photographs Nos.:
L8606 - L8609, L8703

Exhibit 7 Aerial Photographs Nos.:
L8720 - L8729, L8984 - L8989, 08713, L8991
Field Inspection Photographs Nos.:
L8991, L8983, L8985, L8987, L8989, L8727

Exhibit 8 Letter from Wesley A. D'Ewart, Assistant Secretary of the Interior, to William G. Helis, Chairman, Louisiana State Mineral Board, July 11, 1956

Exhibit 9 Letter from William G. Helis, Chairman, Louisiana State Mineral Board, to Wesley A. D'Ewart, Assistant Secretary of the Interior, July 23, 1956

Exhibit 10 Memorandum for the Record, by Earl G. Harrington, Cadastral Engineering Staff Officer, and Donald B. Clement, Cadastral Engineering Officer, for the Interior Department Committee, August 27, 1956

Exhibit 11 Letter from Earl G. Harrington, Chairman, Interior Committee, to Gordon I. Atwater, August 30, 1956

Exhibit 12 Letter from Gordon Atwater to William G. Helis, Jr., Chairman, Louisiana State Mineral Board, September 19, 1956

Exhibit 13 Letter from Gordon Atwater to Earl

G. Harrington, Cadastral Engineering Staff Officer, Bureau of Land Management, September 4, 1956

Exhibit 14 Letter from Earl G. Harrington, Cadastral Engineering Staff Officer, Bureau of Land Manangement, to Gordon Atwater, September 25, 1956

Exhibit 15 Letter from Gordon Atwater to William G. Helis, Jr., Chairman, Louisiana State Mineral Board, January 10, 1957

Exhibit 16 Letter from Gordon Atwater to Donald B. Clement, Acting Cadastral Engineering Staff Officer, Bureau of Land Management, June 12, 1957

Exhibit 17 Letter from Gordon Atwater to Al Glodt, Chairman, Offshore Oeprators Committee, August 9, 1957

Exhibit 18 Letter from Gordon Atwater to T. H. Montgomery, May 28, 1958

Exhibit 19 Letter from Gordon Atwater to Rear Admiral H. Arnold Karo, Director, Coast and Geodetic Survey, June 5, 1958

Exhibit 20 Letter from Gordon Atwater to William Helis, Jr., Committee Chairman, Louisiana State Mineral Board, July 16, 1958

Exhibit 21 Letter from Gordon Atwater and H. M. Hayne, for the State of Louisiana, and Earl G. Harrington and Donald

B. Clement, for the Department of the Interior, to William G. Helis, Jr., Chairman, Louisiana State Mineral Board, August 29, 1958

Exhibit 22 Letter from Gordon Atwater to William G. Helis, Chairman, Louisiana State Mineral Board, February 17, 1959

Exhibit 23 Letter from Gordon Atwater to Earl J. Thomas, Acting Director, Bureau of Land Management, February 23, 1959

Exhibit 24 Letter from Edward Woozley, Director, Bureau of Land Management, to the Director, Coast and Geodetic Survey, March 19, 1959

Exhibit 25 Letter from James C. Tison, Jr., for Rear Admiral H. Harold Karo, Director, Coast and Geodetic Survey, to Gordon Atwater, November 17, 1959

Exhibit 26 Letter from McLain J. Forman to Rear Admiral H. Arnold Karo, Director, Coast and Geodetic Survey, November 19, 1959

Exhibit 27 Letter from Donald B. Clement to Gordon Atwater, November 2, 1961

Exhibit 28 Letter from Gordon Atwater to Donald B. Clement, Consultant, Cadastral Engineering Office, Bureau of Land Management, November 10, 1961

Exhibit 29 Letter from Gordon Atwater to W. Scott Wilkinson, December 1, 1961

Exhibit 30 Report of the Determination of the Contact Line of Mean Low Water of the Gulf of Mexico with the Mainland and Adjacent Islands of the State of Louisiana, by a Committee Representing the U.S. Dept. of Interior and a Committee Representing the State of Louisiana, December 20, 1961

Exhibit 31 John Seldon, *Of the Dominion, or, Ownership of the Sea* (Mare Clausum), transl. by Marchamont Nedham (London, 1652) Book II, Chapter 2, p. 188

Exhibit 32 *The Anna*, 5 Chr. Robinson, Admiralty Reports 373 (1806).

Exhibit 33 Letters from Edward Everett, Ambassador to Great Britain, to Lord Aberdeen, British Foreign Secretary, March 25, 1845, and to James Buchanan, Secretary of State, April 23, 1845, S. Exec. Doc. No. 100, 32d Cong., 1st sess. (1852) pp. 136-140, 152.

Exhibit 34 Seizure in Neutral Waters (the capture of the British ship "Grange" by the French frigate "L' Embuscade" in Delware Bay), 1 *Op. A.G.* 32 (1793).

Exhibit 35 Headland, Sketch of Anacapa Island

in Santa Barbara Channel (1854), United States Coast and Geodetic Survey.

Exhibit 36 Letter from Thomas Bayard, Secretary of State, to Daniel Manning, Secretary of the Treasury, May 28, 1886, in 1 Moore, *Digest of International Law* (1906) 718-721.

Exhibit 37 S. B. Stanton, *The Behring Sea Controversy*, (1892) 52-57.

Exhibit 38 *The Washington*, 4 Moore, *International Arbitrations* (1898), 4342-4344.

Exhibit 39 J. B. Henderson, *American Diplomatic Questions* (1901), 36-37.

Exhibit 40 H. Taylor, *Treatise on International Public Law*, (1901), 137-139, 278-279.

Exhibit 41 Whaling and Sealing Arbitration, Oral Argument of the United States, *Foreign Relations of the United States*, 1902, Appendix I, p. 440.

Exhibit 42 1 Moore, *Digest of International Law*, (1906) pp. 698-713, 730-731, 734-745, 770-771, 783-787, 866-884, 926.

Exhibit 43 River and Harbor Lines, 25 *Op. A.G.* 149 (1906).

Exhibit 44 A. H. Charteris, *Claims of Territorial Jurisdiction in Wide Bays*, (1906-1907) 16 Yale Law Journal 471-496.

Exhibit 45 Corespondence between Carnegie Hero Fund Commission and the Department of State (1909), 3 Letters, Files, United States Department of State, National Archives (Reprinted in 99 Cong. Rec., Part 3, 3622-3623 (1953).

Exhibit 46 North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 1, Report of the Agent of the United States, pp. 18-19 (Cong. Doc. Ser. No. 5929).

Exhibit 47 North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 1, Award of the Tribunal and Dissenting Opinion of Dr. Drago on Question Five, pp. 92-98, 102-106 (Cong. Doc. Ser. No. 5929).

Exhibit 48 North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 8, Argument of the United States, p. 201 (Cong. Doc. Ser. No. 5936).

Exhibit 49 North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 10, Oral Argument of Charles B. Warren for the United States, pp. 1000-1001, 1012-1015, 1078-1989, 1094-1095, 1122-1126, 1201-1227 (Cong. Doc. Ser. No. 5938).

Exhibit 50 North Atlantic Coast Fisheries Ar-

bitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 11, Oral Argument of Elihu Root for the United States, pp. 2150-2153, 2161, 2166-2169 (Cong. Doc. Ser. No. 5939).

Exhibit 51 *Position Taken By This Government in Its Diplomatic Correspondence with Respect to the Three-Mile Limit and Its Extension*, Memorandum by the Office of the Solicitor, Department of State, Nov. 30, 1921. Files, United States Department of State, National Archives.

Exhibit 52 Henry S. Fraser, *The Extent and Delimitation of Territorial Waters*, (1926) 11 Cornell L. Q. 455.

Exhibit 53 Memorandum by the Office of the Solicitor, Department of State, March 2, 1926. Files, United States Department of State, National Archives.

Exhibit 54 Letter from W. R. Castle, Jr., for the Secretary of State, to O. C. Kiep, German Charge' d' Affaires ad interim, Oct 6, 1927. United States Department of State, National Archives.

Exhibit 55 *A compilation of the Provisions of Law in Force in the United States in Regard to Territorial Waters*, Memorandum of Department of State, acocmpanying letter of Oct. 6, 1927, above. Files, United States

Department of State, National Archives.

Exhibit 56 Letter from E. F. Morgan, Acting Secretary of Commerce, to the Secretary of State [Frank B. Kellogg] Apr. 24, 1928. Files, United States Department of State, National Archives.

Exhibit 57 Letter from the Secretary of State to H. H. Bachke, Norwegian Minister (July 11, 1928). Files, United States Department of State, National Archives.

Exhibit 58 *Territorial Waters and Fishery Boundaries*, Memorandum by the Treaty Division, Department of State, Dec. 7, 1928. Files, United States Department of State, National Archives.

Exhibit 59 Memorandum by the Treaty Division, Department of State, Dec. 8, 1928. Files, United States Department of State, National Archives.

Exhibit 60 Memorandum by the Officer of the Solicitor, Department of State, Dec. 17, 1928. Files, United States Department of State, National Archives.

Exhibit 61 Memorandum by the Division of Western European Affairs, Department of State, Jan. 15, 1929. Files, United States Department of State, National Archives.

Exhibit 62 Memorandum by the Treaty Division, Department of State, Jan. 18, 1929. Files, United States Department of State, National Archives.

Exhibit 63 Memorandum by the Treaty Division, Department of State, Jan. 19, 1929. Files, United States Department of State, National Archives.

Exhibit 64 Letter from W. R. Castle, Jr., for the Secretary of State, to the Secretary of the Navy[Charles Francis Adams], Apr. 22, 1929. Files, United States Department of State, National Archives.

Exhibit 65 Letter from W. R. Castle, Jr., for the Secretary of State, to the Secretary of the Treasury [Andrew W. Mellon], Apr. 22, 1929. Files, United States Department of State, National Archives.

Exhibit 66 Letter from C. F. Adams, Secretary of the Navy, to the Secretary of State [Charles Evans Hughes], May 8, 1929. Files, United States Department of State, National Archives.

Exhibit 67 Letter from W. R. Castle, Jr., for the Secretary of State, to the Secretary of the Treasury [Andrew W. Mellon], May 13, 1929. Files, United States Department of State, National Archives.

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Exhibit 124 Letter from Gordon Atwater to Earl J. Harrington, Feb. 8, 1957. Files, Department of the Interior, Bureau of Land Management, Washington, D. C.

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Exhibit 150 U. S. Army, Corps of Engineers Photograph 11872-5.

Exhibit 151 U. S. Army, Corps of Engineers Photograph 11872-20.

Exhibit 152 U. S. Army, Corps of Engineers Photograph 11880-1.

Exhibit 153 U. S. Army, Corps of Engineers Photograph 7833-27.

Exhibit 154 U. S. Army, Corps of Engineers Photograph 11872-19.

Exhibit 155 Photograph, Frame B: South Pass Entrance looking east along the hook, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.

Exhibit 156 Photograph, Frame C: The hook at South Pass Entrance, June 9, 1962. Woods Hole Oceanagraphic Institution Data Library, Woods Hole, Mass.

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Exhibit 158 Aerial Photomosaic, Pass a Loutre. Files, Liskow and Lewis, 225 Baronne St., New Orleans, Louisiana.

Exhibit 159 Letter dated March 20, 1963, from Austin W. Lewis to Archibald Cox, Solicitor General. Files Department of Justice.

Exhibit 160 Photographs Nos. 1, 2, 5, 6, 7, 10, 11, 12, 14 15 and 17 taken by S. V. Asbury Jr., May 31, 1960. Files, Department of Justice, Washington, D. C.

Exhibit 160A Reproduction of part of Map 2 of 8, showing location of Asbury photographs.

Exhibit 160B Original contact prints of Asbury photographs (introduced for inspection and withdrawn, subject to re-examination if necessary).

Exhibit 161 Affidavit of Mr. Jonathan I. Charney, Attorney, Department of Justice, Washington, D. C., August 31, 1971.

Exhibit 162 Photographs A and B taken by Jonathan I. Charney, June 20, 1970.

Exhibit 163 Photograph, Frame A: Southeast Pass looking north from the Gulf of Mexico, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.

Exhibit 164 A portion of U.S.C. & G.S. Topographic Survey Number 3630 (1916) (mounted).

Exhibit 164-A Same, unmounted (originally numbered 164; renumbered 164A, January 26, 1971).

Exhibit 165 A portion of U.S.C. & G.S. Hydrographic Survey Number 6637 (1946) (mounted).

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Exhibit 168 Letter, from J. A. Austin, District Service Manager, Gulf Oil Corporation, to U.S. Army District Engineer. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana.

Exhibit 169 Letter, from J. A. Austin to U.S. Army District Engineer, July 6, 1959. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.

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to Gulf Oil Corporation, August 20, 1959. Files, Gulf Oil Corp., P. O. Box 61590 New Orleans, Louisiana 70160.

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Exhibit 175 Letter from J. A. Austin to U. S. Army District Engineer, December 21, 1959. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.

Exhibit 176 Photograph, Frame D: Pass Tante Phine Entrance viewed from the west, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.

Exhibit 177 Photograph, Frame E: Pass Tante Phine entrance viewed from the west, June 9, 1962. Woods Hole, Oceanographic Institution Data Library, Woods Hole, Mass.

Exhibit 177 Photograph, Frame E: Pass Tante Phine entrance viewed from the west, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.

Exhibit 178 Photograph, Frame F: Dredged area north of Pass Tante Phine Entrance, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.

Exhibit 179 Hydrographic Survey, Pass Tante Phine Spoil Bank, August 4, 1966. U.S. Corps of Engineers, New Orleans, District.

Exhibit 180 A Portion of U.S.C. & G.S. Hydrographic Survey Number 6172 (1936). U.S. Coast and Geodetic Survey.

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Exhibit 182 Office Memorandum, from Lt. Robert C. Phillips, USCG, to Chief, Aids to Navigation Section, July 3, 1953. Files, United States Coast Guard, 8th District.

Exhibit 183 Letter from Jules Minnich, Terrebonne-LaFourche Boatmen's Association, to the Commandant, U.S.C.G., 8th District, July 7, 1953. Files, United States Coast Guard, 8th District.

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Exhibit 186 Letter from Mr. Ralph B. Bisland, Secretary Treasurer, Terrebonne Parish Police Jury, to Commander Coast Guard, Eighth Naval District, May 29, 1957. Files, United States Coast Guard, 8th District.

Exhibit 187 Affidavit of Jonathan I. Charney, Attorney, Department of Justice, Washington, D. C.

Exhibit 188 Photographs C and D taken by Jonathan I. Charney, June 20 and 22, 1970.

Exhibit 189 Photographs E and F taken by Jonathan I. Charney, June 20, 1970.

Exhibit 190 Affidavit of Mrs. D. T. Atkinson.

Exhibit 190A Photograph Roll 5-A No. 7 taken by John R. May, Geographer, Geology

Branch, Waterways Experiment Station, Vicksburg, Mississippi, June 22, 1970.

Exhibit 191 A portion of U.S.C. & G.S. Hydrographic Survey Number 5537 (1934) (mounted).

Exhibit 191A Same, unmounted (originally numbered 191; renumbered 191A, January 26, 1971).

Exhibit 192 Affidavit of Jonathan I. Charney, Department of Justice, Washington, D. C. 20530.

Exhibit 193 Photograph G taken by Joanthan I. Charney.

Exhibit 194 Photograph, Frame G: Point au Fer viewed from the west, June 10, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.

Exhibit 195 Executive Order, Reservation of Shell Keys for a Light House, July 9, 1855. National Archives, Washington, D.C.

Exhibit 196 Executive Order, Shell Keys Reservation, August 17, 1907. National Archives, Washington, D. C.

Exhibit 197 Photograph, Frame H: Southern Shore of Marsh Island, June 10, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.

Exhibit 198 Photograph, Frame I: Southern Shore of Marsh Island, June 10, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.

Exhibit 199 Photograph 66-HC-1793, Western Coast of Louisiana, Gemini Flight 9, Magazine 9, Frame 40, Height- 160 nautical miles, September 14, 1966, National Aeronautics Service Administration.

Exhibit 200 Report to Bureau of Land Management, Mean Low Water Line Survey for Nine Specific Areas, Mississippi River Delta Louisiana, Mississippi River Delta Louisiana, 1970 (In ten volumes). U. S. Coast and Geodetic Survey.

Exhibit 201 Maps Illustrative of Issues. United States Department of Justice.

Exhibit 202 *Geological Observations on the Origin, Nature and Distribution of Mudlumps, Barrier Islands and Oyster Reefs of Coastal Louisiana*, by C. R. Kolb and R. T. Saucier (August 1970).

Exhibit 203 *Appendix A of Geological Observations on the Origin, Nature and Distribution of Mudlumps, Barrier Islands and Oyster Reefs of Coastal Louisiana*, by C. R. Kolb and R. T. Saucier (August 1970).

Exhibit 204 Affidavit of Mr. R. J. Simon.

Exhibit 205 Affidavit of Mr. Ellwood Ott.

Exhibit 206 Affidavit of Mr. E. T. Oliver.

Exhibit 207 Affidavit of Mr. Harland R. Cravat.

Exhibit 208 Affidavit of Mr. Harland R. Cravat.

Exhibit 209 Affidavit of Mr. Erwin L. Methe.

Exhibit 210 Affidavit of Mr. Erwin L. Methe.

Exhibit 211 Affidavit of Mr. D. T. Atkinson.

Exhibit 212 Affidavit of Mr. Paul W. Scoggan.

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Exhibit 214 Aerial Photographs Nos.: 25, 24, 23, 22, 21, 20, of V311RW M1063

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Exhibit 216 Aerial Photographs Nos.: M-17-89-42, M-17-88-3

Exhibit 217 Aerial Photographs Nos.: 724-190 - 724-194

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Exhibit 251 Aerial Photographs Nos.: L8091R, L8090R, L8089R, L8088R, L8087R, L8086R, L8085R, L8084R, L8083R. E4780, E4779, E4778, E4777, E4776, E4775, E4774, E4773, E4772, L8323R, L8322R, L8321R, L8320R, L8319R, L8318R, L8317R, L8316R, E5019, E5018, E5017, E5016, E5015, E5014, E5013, E5012.

Exhibit 252 Aerial Photographs Nos.: E5035 - E5049, L8339R - L8353R

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Exhibit 258 Sheet L37, Photomosaic, Ammann International, San Antonio, Texas.

Exhibit 259 Uncontrolled mosaic prepared from aerial photos flown Dec. 1968, Photo 71, File No. 8-3, Corps of Engineers, U.S. Army Engineer District, New Orleans.

Exhibit 260 Uncontrolled mosaic prepared from aerial photos flown Dec. 1968, and March 1969, Photo 83, File No. 8-3, Corps of Engineers, U.S. Army Engineer District, New Orleans.

Exhibit 261 Affidavit of Donald B. Wilson

Exhibit 262 Affidavit of Harland T. Cravat, U.S.C. & G.S.

Exhibit 263 Affidavit of William M. Dunkle, Jr., Woods Hole Oceanographic Institute

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Exhibit 266 Bureau of Land Management leasing map, Louisiana outer continental shelf, showing leases maintained under section 6 of the Outer Continental Shelf Lands Act.

Exhibit 267 Map showing route of coast flight by Special Master and counsel, October 18, 1970 (two sheets).

Exhibit 268A Bennett G. Jones deposition, vol. 1.

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Exhibit 269 Gordon Atwater deposition.

Exhibit 270 Newton Beauvais deposition.

Exhibit 271 Sketch of sine curve wave and mud-lump (accompanying cross-examination of Curtis L. Buttorff).

Exhibit 272 Sketch of Mudlump 90, by Curtis L. Buttorff.

Exhibit 273 Letter of April 29, 1959, from Mr. Austin, Gulf Oil Company to the Corps of Engineers, U.S. Army.

Exhibit 274 Letter of June 11, 1964, from Mr. Price, Gulf Oil Company, to the Corps of Engineers, U.S. Army.

Exhibit 275 Bureau of Land Management records of leases maintained under section 6 of the Outer Continental Shelf Lands Act.

Exhibit 276 Report on Wind and Weather Conditions, by Arthur Cooperman.

Exhibit 277 Map of Shell Keys (Copy of No. 17 in U.S. Exh. No. 201) marked by Alexander Melamid to delimit the mainland.

Exhibit 278A Map of Isle Dernier (copy of No. 14 in U.S. Exh. No. 201) showing route of David Morgan - Frederick Ellis trip, September 5, 1970.

Exhibit 278B Xerox copy of part of Map 19 of 41, showing location of David Morgan photo No. 1.

Exhibit 278C Same, photo No. 2

Exhibit 278D Same, photo No. 3

Exhibit 278E Xerox copy of part of Map 19 of 41, showing location of David Morgan photo No. 4.

Exhibit 278F Same, photo No. 5.

Exhibit 278G Same, photo No. 6.

Exhibit 279 Notes by Mr. Francis Zimmerman.

HEARINGS IN WASHINGTON

Exhibit 280

1. Letter, October 24, 1969, to Victor Sachse from George Swarth, submitting three informal survey interrogatories.
2. Letter, February 24, 1970, to Frederick W. Ellis from Jonathan Charney, enclosing transcript of Rhode Island Conference of 1966.
3. Letter, April 28, 1970, to Louis F. Claiborne from Frederick Ellis, enclosing their replies to our three survey interrogatories of October 24, 1969.

Exhibit 281

1. Letter, January 20, 1970, to Victor Sachse from George Swarth, submitting interrogatories to the State of Louisiana.
2. Letter, May 7, 1970, to Walter Armstrong from Frederick Ellis, enclosing Preliminary Response to the Informal Interrogatories Addressed by the United States to the State of Louisiana on January 20, 1970.
3. Letter, August 19, 1970, to Peter Strauss from Frederick Ellis enclosing exhibit "Bucket Bend Bay" to satisfy interrogatories of January 20, 1970.

Exhibit 282

1. Letter, April 8, 1970, to Victor Sachse from Jonathan Charney, requesting minutes of the Louisiana State Mineral Board on the subject of mean low-water line survey from 1956-1961.
2. Letter, April 21, 1970, to Jonathan Charney from Victor Sachse, advising State Mineral Board is gathering the material requested.
3. Letter, August 7, 1970, to Jonathan Charney from Victor Sachse, advising he had felt the request was satisfied but inform him of what we desire and he will again request if from the State Mineral Board.
4. Letter, August 17, 1970, to Victor Sachse from George Swarth, advising him of the materials we want from the State Mineral Board.

Exhibit 283

1. Letter, July 1, 1970, to Victor Sachse from George Swarth, submitting First Formal Interrogatories to the Defendant, State of Louisiana and Request for Production of Documents Number One.
2. Answers and Objections of the Defendant, State of Louisiana, to the First Formal Interrogatories and Request for Production of

Documents Number One of the United States, dated Aug. 5, 1970.

Exhibit 284

1. Letter, August 14, 1970, to Victor Sachse from George Swarth, submitting United States First Formal Request for Admissions.
2. Letter, September 15, 1970, to Peter Strauss from Frederick Ellis, enclosing the State of Louisiana's Answer to First Formal Request for Admissions.

Exhibit 285

1. United States Second Formal Request for Admissions, dated August 19, 1970.
2. Response to United States Second Formal Request for Admissions, dated September 18, 1970.

Exhibit 286

Second Formal Interrogatories to the Defendant, State of Louisiana, dated August 19, 1970.

Exhibit 287

1. United States Fourth Formal Request for Admission, dated September 1, 1970.
2. Response to United States Fourth Formal Request for Admissions, dated September 18, 1970.

Exhibit 288

Certified copy of Diplomatic Note from the Department of State to the Charge d'Affaires ad interim of Germany, sent October 6, 1927, Files, United States Department of State.

Exhibit 289 Certified copy of a compilation of the provisions of law in force in the United States in regard to territorial waters, Files, United States Department of State.

Exhibit 290 Certified copy of a Note sent July 11, 1928, from the Department of State to the Minister of Norway, Files, United States Department of State.

Exhibit 291 Certified copy of an Inter Bureau memorandum dated December 7, 1928, Files, United States Department of State.

Exhibit 292 Certified copy of a Diplomatic Note from the Department of State to the Charge d'Affaires ad interim of Norway sent July 13, 1929, Files, United States Department of State.

Exhibit 293 Certified copy of an Aide-Memoire from the Department of State to Norwegian Embassy, sent September 29, 1949, Files, United States Department of State.

Exhibit 294 Certified copy of a Diplomatic Note from the Ambassador of Japan to the Secretary of State delivered on May 3, 1962, Files, United States Department of State.

Exhibit 295 Hawkins, Pleas of the Crown, 6th ed., 1787, p. 73.

Exhibit 296 *Hale's DeJure Maris, Hargrave's Law Tracts*, pp. 10, 11.

Exhibit 297 *Coke's Institutes*, Part 4, 1797, pp. 135, 140-141.

Exhibit 298 East, Pleas of the Crown, Vol. II, 1803, pp. 802-804.

Exhibit 299 Message of the President of the United States, Communicating the Proceedings of the Commissioners for the Adjustment of Claims under the Convention with Great Britain of February 8, 1853 (Schooner Washington), August 11, 1856, S. Exec. Doc. No. 103, 34th Cong., 1st sess. [Cong. Doc. Ser. No. 824], pp. 170-186.

Exhibit 300 *Regina* v. *Cunningham*, Bell's Crown Cases, 1858-1860, pp. 72-86.

Exhibit 301 Woolsey, *Introduction to the Study of International Law* 6th ed., (1899), pp. 76-77.

Exhibit 302 Gould, *A Treatise on the Law of Waters, Including Riparian Rights, and Public and Private Rights in Waters Tidal and Inland* (3rd ed., 1900), pp. 14-16.

Exhibit 303 Gregory, *The Recent Controversy as to the British Jurisdiction Over Foreign Fishermen More Than Three Miles from Shore: Nortensen v. Peters*, 1 Am. Pol. Sci. Rev. (1906-1907), pp. 410-437.

Exhibit 304 Fulton, *Sovereignty of the Sea*, pp. 188, 618-621, 696-698 (1911).

Exhibit 305 Hyde, *International Law Chiefly as Interpreted and Applied by the United States*, Vol. I, pp. 251-267 (1922).

Exhibit 306 Hurst, *The Territoriality of Bays*, III British Yearbook of International Law, 1922-1923, pp. 42-54.

Exhibit 307 Hurst, *Whose is the Bed of the Sea?*, IV British Yearbook of International Law (1923-1924), pp. 34-43.

Exhibit 308 Jessup, *The Law of Territorial Waters and Maritime Jurisdiction* (1927), pp. 13-18 and 355-362.

Exhibit 309 League of Nations, Acts of the Conference for the Codification of International Law, Meetings of the Committees, Vol. III (1930), pp. 218-219.

Exhibit 310 Hackworth, *Digest of International Law*, Vol. II (1941), pp. 679-680.

Exhibit 311 Vallat, Note, XXIII the British Yearbook of International Law, 1946, pp. vi, 333-338.

Exhibit 312 Lauterpacht, *Sovereignty Over Submarine Areas*, XXVII B.Y.B.I.L. (1950), pp. 376-433.

Exhibit 313 Judgment, *Fisheries Case*, I.C.J. Reports (1951), p. 116 at 163-166.

Exhibit 314 Yearbook of the International Law Commission, 1952, Vol. I, pp. 172-173, 177-178, 188-190.

Exhibit 315 Francois, *Addendum to the Second Report of the Regime of the Territorial Sea*, U.N. Doc. A/CN.4/61/Add.1 (18 May 1953).

Exhibit 316 Yearbook of the International Law Commission, 1954, Vol. I, pp. 65, 9094, Vol. II, pp. 155-156.

Exhibit 317 Yearbook of the International Law Commission, 1956, Vol. I pp. 73-74, 205-216, 219-221, Vol. II, pp. 36-38.

Exhibit 318 Yearbook of the International Law Commission, 1956, Vol. I pp. 190-193, Vol. II, pp. 268-270.

Exhibit 319 United Nations Conference on the Law of the Sea, Official Records, Vol. III, A CONF. 13/39, 1958, pp. 144-146, 161-162, Annexes pp. 227-228, 240-242.

Exhibit 320 Status of Ratification of 1958 Convention on the Territorial Sea, 89 Cong. Rec. Part 3 (1965), pp. 10312-10313.

Exhibit 321 S. 1954, a bill to protect coastal fishery and other resources by implementing the Convention on the Territorial Sea and the Contiguous Zone, 89th Cong., 1st sess., May 12, 1965.

Exhibit 322 Judgment, North Sea Continental Shelf, I.C.J. Reports, 1969, pp. 33-36.

Exhibit 323 Letter, March 1, 1966, to Archibald Cox, Special Assistant to the U.S. Attorney General, from Paul M. Hebert,

Special Counsel to the Attorney General of Louisiana, re April 1961 Memorandum of the U.S. Coast and Geodetic Survey Presenting Recommendations on Delineation of Louisiana Coastline. Source: U.S. Department of Justice.

Exhibit 324 Letter, March 4, 1966, to Paul M. Hebert from Archibald Cox, in response to Mr. Hebert's letter of March 1, 1966. Source: U. S. Department of Justice.

Exhibit 325 Letter, March 16, 1966, to Paul M. Hebert from Archibald Cox. Source: U.S. Department of Justice.

Exhibit 326 Letter March 22, 1966, to Paul M. Hebert from George S. Swarth, Attorney, Land and Natural Resources Division, U.S. Department of Justice, transmitting Accession No. 62512 subject to terms of March 16, 1966 letter. Source: U.S. Department of Justice.

Exhibit 327 Letter, March 28, 1966, to Dean Paul M. Hebert from Archibald Cox acknowledging his letter of March 22, 1966. Source: U.S. Department of Justice.

Exhibit 328

1. Certification dated December 17, 1970, by Nancy E. Pearl, Consul of the United States of America, certifying annexed copy of Note No. 1639 of December 2, 1970,

is a true copy of the copy filed in that Embassy.

2. Certified copy of Note No. 1639 dated December 2, 1970, with enclosed letter, dated November 10, 1970, to John R. Stevenson, the Legal Adviser of the Department of State, from Shiro Kashiwa, Assistant Attorney General, U.S. Department of Justice.

Exhibit 329

1. Certification dated December 17, 1970, by Nancy E. Pearl, Consul of the United States, certifying annexed copy of Note No. 513158 of December 16, 1970, is true copy of original.
2. Certified copy of Note No. 513158 of December 16, 1970.

Exhibit 330 Department of State Translation of Note No. 513158.

Exhibit 331 Letter, November 20, 1970, to Shiro Kashiwa, from John R. Stevenson. Source: U.S. Department of Justice.

Exhibit 332

1. Letter, December 10, 1970, from Frederick Ellis to Peter Strauss, transmitting Louisiana Answers to U.S. Second Formal Interrogatories to the State of Louisiana.
2. To answers to U.S. Second Formal Interrogatories to the State of Louisiana.

Exhibit 333 Shirley and Ragsdale, eds., *Deltas in*

Their Geologic Framework (Houston Geological Society) pp. 232-251.

Exhibit 334 United States Tariff Commission Maps prepared for the purpose of facilitating the conduct of an investigation under S. Res. 314, 71st Cong., 2d Sess. (1930).

Exhibit 335 Act No. 145, Louisiana Acts, 1942, pp. 483-495.

Exhibit 336 Act No. 385, Louisiana Acts, 1948, pp. 1040-1048.

Exhibit 337 Act No. 386, Louisiana Acts, 1948, pp. 1049-1071.

Exhibit 338 Portion of U.S.C. & G.S. Chart Number 1272, all editions and revised editions from the 9th revised edition. March 28, 1949, through the 25th edition, August 15, 1970.

Exhibit 339 Documents relating to establishment and discontinuance of navigational aids at Pass Tante Phine by Shell Oil Co., Files, U.S. Coast Guard, Eighth District, New Orleans, Louisiana.

Exhibit 340 Naval Oceanographic Office, Weekly Notice to Mariners, 44/62 and 34/66.

Exhibit 341 Letter from Philip B. Perlman, Solicitor General, to Bolivar E. Kemp, Jr., Attorney General of Louisiana, March 16, 1951, Department of Justice.

Exhibit 342 *Louisiana* v. *Dardar*, Opinion, November 8, 1970, Clerk of the Supreme Court of Louisiana.

Exhibit 343 Procedures for the Creation of a Boundary for the Maritime Zone Between Mexico and the United States in the Gulf of Mexico, Department of State.

Exhibit 344 Commander R. L. Swanson, National Oceanic and Atmospheric Administration, Report on Tidal Data Mississippi River Delta Mapping Program, (December 1970).

Exhibit 345 Data prepared by Mr. Meade, Chief, Triangulations Branch, Geodesy Division NOS, NOAA.

Exhibit 346 Wind and Weather Conditions in the Mississippi River Delta Regions, Supplemental Report, December 17, 1970, prepared by Arthur I. Cooperman.

Exhibit 347 Map of a Military Reconnaissance and Survey of the approaches to New Orleans from the Gulf of Mexico between the Mississippi and Atchafalaya Rivers. Made under the direction of Capt. Geo. W. Hughes (1842).

Exhibit 348 Chart of the Gulf of Mexico and Windward Passages including the Islands of Cuba, Haiti, Jamaica, Puerto Rico, and the Bahamas. Compiled principally from the Surveys made by order of the British, Spanish, and United States Governments.

Published by James Imray and Son. (1865).

Exhibit 349 Measurement of the area between North Pass and Dead Women Pass (Bucket Bend Bay).

Exhibit 350 Measurement of the areas adjacent to Pass a Loutre, Southeast Pass, and South Pass.

Exhibit 351 East Bay Closing Lines illustrating the application of the Boggs formula to the closing lines described in Louisiana Exhibit 23A.

Exhibit 352 East Bay Closing Lines illustrating the application of the Boggs formula to the closing lines described in Louisiana Exhibit 197.

Exhibit 353 East Bay Closing Lines illustrating the application of the Boggs formula to the closing lines described in Louisiana Exhibit 180.

Exhibit 354 Measurement of the Caminada-Barataria Bay area.

Exhibit 355 Measurement of the Caillou Bay area.

Exhibit 355A Replacement for U.S. Exhibit No. 355 (measurement of Caillou Bay area), with corrected bar scale.

Exhibit 356 Measurement of the Point au Fer and Shell Keys area.

Exhibit 357 Certified copy of a portion of U.S.C. & G.S. Chart No. 1272, 9th ed., revised May 18, 1953, showing East Bay.

Exhibit 358 Certified copy of a portion of U.S.C. & G.S. Chart No. 1272, 9th ed., revised July 26, 1954, showing East Bay.

Exhibit 359 Certified copy of a portion of "Map of a Military Reconnaissance and Survey of the Approaches to New Orleans from the Gulf of Mexico between the Mississippi and Atchafalaya Rivers. Made under the direction of Capt. Geo. W. Hughes (1842)," showing Caillou Boca.

Exhibit 360 Certified copy of "Map of a Military Reconnaissance and Survey of the Approaches to New Orleans from the Gulf of Mexico between the Mississippi and Atchafalaya Rivers. Made under the direction of Capt. Geo. W. Hughes (1842)."

Exhibit 361 Composite of U.S.C. & G.S. Chart No. 1116, 22d ed., May 16, 1970, and part of U.S.C. & G.S. Chart No. 1115, ed. July 4, 1970.

Exhibit 362 U.S.C. & G.S. Chart No. 1273, 25th ed., August 15, 1970.

Exhibit 363 U.S.C. & G.S. Chart No. 1273, 12th ed., August 15, 1970.

Exhibit 364 U.S.C. & G.S. Chart No. 1050, 11th ed., October 3, 1970.

Exhibit 365 Certified copy of letter dated April

30, 1962, to Archibald Cox, Solicitor General and Attorney General Jack P. F. Gremillion of Louisiana, from appointed Members of the Joint Committee, Messrs. Swarth, Clement, Gumm, Atwater, Hayne, and Wilkinson, submitting its report.

Exhibit 366 Certified copy of a letter dated October 27, 1961, to Solicitor General Archibald Cox from Jack P. F. Gremillion, Attorney General of Louisiana, enclosing recent news article and press release issued thereafter.

Exhibit 367 Affidavit of Donald J. Simon, January 6, 1971.

Exhibit 368 Copy of part of Map 8 of 8, marked by James F. Richardson to show location of Shell Oil Co. navigational buoys at Pass Tante Phine.

Exhibit 369 Copy of part of U.S.C. & G.S. Chart No. 1272 (9/17/56) showing location of areas designated "6", "7", and "8" in East Bay and at South Pass.

Exhibit 370 Copy of parts of Maps 4 and 5 of 8, showing location of areas designated "6", "7", and "8" in East Bay and at South Pass.

Exhibit 371 Copy of part of U.S.C. & G.S. Chart No. 1272 (9/17/56) showing location of areas designated "3" and "9" near Pass du Bois and Tiger Pass.

Exhibit 372 Copy of parts of Maps 7 and 8 of 8, showing location of areas designated "3" and "9" near Pass du Bois and Tiger Pass.

Exhibit 373 Copy of part of U.S.C. & G.S. Hydrographic Survey No. 5824, January - May, 1935, showing Point au Fer and nearby shell reefs.

Exhibit 374 Set of 54 maps accompanying the Report of the Determination of the Contact Line of Mean Low Water of the Gulf of Mexico with the Mainland and Adjacent Islands of the State of Louisiana, dated December 20, 1961, submitted by committees appointed for that purpose. ("Committee Maps," designated 1 through 41 of 41, 1 through 8 of 8, and 1 through 5 of 5.)

Exhibit 375 Copy of parts of Maps 7 and 8 of 8 (vicinity of Pass du Bois and Tiger Pass).

Exhibit 376 List of publications by Dr. Charles R. Kolb.

Exhibit 377A Black-and-white copy of Tariff Commission map, on base U.S.C. & G.S. Chart No. 1115, for use in Customs District 19-20.

Exhibit 377B Black-and-white copy of Tariff Commission map, on base U.S.C. & G.S. Chart No. 1116, for use in Customs District 19-20.

Exhibit 378	List of publications by Dr. Roger T. Saucier.
Exhibit 379	Reduced scale, black-and-white composite of Committee Maps, Point au Fer to Shell Keys.
Exhibit 380	List of birdfoot deltas.
Exhibit 381	List of publications by Mr. Buford K. Meade.
Exhibit 382	Copy of page 107, League of Nations Acts of the Conference for the Codification of International Law (1930): Meetings of the Committees, Vol. III, Minutes of the Second Committee: Territorial Waters (L.N. Doc. No. C.351 (b). M. 145 (b). 1930.V.)
Exhibit 383	Copy of Document No. 19, League of Nations Conference for the Codification of International Law (1930).
Exhibit 384	United States coastline description, revised January 25, 1971.
Exhibit 385	U.S.C. & G.S. Chart No. 1274, June 6, 1970, revised through Notice to Mariners 23/70 (mounted).
Exhibit 386	U.S.C. & G.S. Chart No. 1275, June 27, 1970, revised through Notice to Mariners 26/70 (mounted).
Exhibit 387	U.S.C. & G.S. Chart No. 1276, February 14, 1970, revised through Notice to Mariners 7/70 (mounted).
Exhibit 388	U.S.C. & G.S. Chart No. 1277, July

	4, 1970, revised through Notice to Mariners 27/70.
Exhibit 389	Set of 54 Committee Maps, at reduced scale, showing the United States coastline contention.
Exhibit 389A	Three mile arc templates to accompany U.S. Exhibit 389.
Exhibit 390	Louisiana's Response to the United States Fifth Formal Request for Admissions.
Exhibit 391	Louisiana's Response to the United States Sixth Formal Request for Admissions.
Exhibit 392	Louisiana's Response to the United States Third Formal Interrogatories.
Exhibit 393	Sketch by Dr. Robert D. Hodgson, illustrating the 45° test for headlands.
Exhibit 394	Sketch illustrating alternative inner and outer headlands.
Exhibit 395	Sketch illustrating rounded headlands and a circular bay.
Exhibit 396	Sketch by Dr. Robert D. Hodgson illustrating application of the 45° test.
Exhibit 397	Sketch of a headland not associated with a bay.
Exhibit 398	Sketch by Dr. Robert D. Hodgson, illustrating selection of the entrance point on a rounded headland by use

of the bisector of the angle between lines projecting the general trend of the coast and the general trend of the water line of the indentation.

Exhibit 399 Sketch by Dr. Robert D. Hodgson, illustrating use of a 3-mile arc to ascertain shore points that affect the 3-mile limit.

Exhibit 400 Sketch illustrating treatment of an island as essentially mainland.

Exhibit 401 Sketch illustrating how differences in the shoreline affect the propriety of drawing closing lines to an island.

Exhibit 402 Sketch illustrating the effect of screening islands in reducing the area of inland waters in a bay.

BATON ROUGE HEARING

Exhibit 403 U.S. & G.S. Chart 5107, 30th ed. April 11, 1970, corrected thru NM 15/70. (With penciled closing line and application of the Boggs formula.)

Exhibit 404 Sketch of a nearly circular bay.

Exhibit 405 Sketch of a slight coastal curvature.

Exhibit 406 Sketch of a 90-degree coastal turn.

Exhibit 407 Sketch of a stair step coastal turn.

Exhibit 408 Sketch of a bay with double headlands.

Exhibit 409 Sketch of a bay with a remote coastal angle.

Exhibit 410 Sketch of a bay with a remote coastal angle.

Exhibit 411 Sketch by David Morgan of application of the semicircle test to a deep bay.

Exhibit 412 Sketch by David Morgan of an indentation that does not meet the semicircle test.

Exhibit 413 Sketch of closing lines in an interior indentation in a coastal curvature.

Exhibit 414 Sketch of small and large promentories.

Exhibit 415 Sketch of Louisiana Exhibit 338 at actual reduced scale.

Exhibit 416A Letter of April 27, 1971 from the Geographer of the Department of State to the First Secretary of the Embassy of the Federal Republic of Germany transmitting a set of 155 charts showing the provisional baseline territorial sea and contiguous zone of the United States.

Exhibit 416B A similar letter to Mr. E. John Cooper, Territorial Waters Office, Department of Fisheries and Forests, Dominion of Canada.

Exhibit 416C A similar letter to Mr. R. J. Fisher, President, Pickford and Black, Ltd. Halifax Canada, with a notation that copy was sent to Mr. Andrzei Wojtowicz.

Exhibit 416D	A set of 155 maps showing the limit of the territorial sea and contiguous zone of the United States and the limit of inland waters where needed for delimitation of those lines.
Exhibit 417	Deposition of Commander R. Lawrence Swanson.
Exhibit 418	Inked drawing used in conjunction with Comm. Swanson's deposition.
Exhibit 419A	Chart No. 8 of series of charts of Norwegian coast contained in Annex 35 of the reply of the United Kingdom in the Anglo-Norwegian Fisheries Case.
Exhibit 419B	Chart No. 9 of same as above (Norwegian maps).

No. 9, Original

In the Supreme Court of the United States

OCTOBER TERM, 1974

UNITED STATES OF AMERICA,
Plaintiff,

v.

STATE OF LOUISIANA, ET AL.,
Defendants.

APPENDIX III
CLOSING LINE CONTENTIONS OF THE STATE OF LOUISIANA INCLUDING POINT TO POINT DESCRIPTION

MISSISSIPPI RIVER DELTA

By straight lines:

	X	Y
Beginning at	2742583	353754
through	2737288	345654
through	2755325	204680
through	2755178	203815
through	2754925	203475
through	2754100	186915
through	2754263	186316
through	2753885	183460
through	2752470	182170
through	2751045	181305
through	2726105	148530
through	2724850	148150
through	2702461	124148
through	2701735	123905
through	2701255	124130
through	2701003	121725
through	2701237	120486
through	2701773	118961
through	2701672	118777
through	2701421	118995
through	2701221	118945
through	2701104	118141
through	2700970	117990
through	2700786	117889
through	2700535	117889
through	2699658	116782
through	2698997	117204
through	2697850	117200
through	2609180	91445
through	2607290	93040
through	2590100	203860

through	2589100	204125
through	2587400	205250
ending at	2585000	206975

CAILLOU BAY

By straight lines:

	X	Y
Beginning at	2164477	134753
through	2162430	135112
through	2157920	135521
through	2148929	136962
through	2147751	136599
through	2143589	136276
through	2139529	136276
through	2138231	136387
through	2134210	136726
through	2133089	136940
through	2128819	138694
through	2126697	139353
through	2122523	140238
through	2118829	141971
through	2118065	142532
through	2117317	143491
ending at	2076201	189799

SHELL KEYS

By straight lines:

	X	Y
Beginning at	1845475	293595
through	1846296	293267
through	1846637	292250
through	1845817	292053
through	1845331	290564
through	1845187	289107

through	1845935	287020
through	1845633	283208
through	1844412	280498
through	1844320	278858
through	1843467	275912
through	1839563	275511
through	1838067	274547
through	1837076	273569
through	1835344	270839
through	1834019	270301
through	1833527	271423
through	1833815	273018
through	1833822	274343
through	1833848	275957
through	1834163	276830
through	1835948	277559
through	1836138	278838
through	1835397	281476
through	1833612	283982
through	1833782	284744
through	1835738	286620
through	1835246	287834
through	1833763	290104
through	1833231	292919
through	1834432	294953
through	1835042	296456
ending at	1835502	296712

SPECIFIC DISPUTED SECTOR DESCRIPTIONS

1. **In the Mississippi Delta area described in issue A-1 from Errol Shoal to the western headland of Sandy Point Bay.** If Louisiana's historic waters (including historic straight baseline claims) are not accepted by the Court, the coast line description would be as contended in U. S. Exh. 389, proceeding from the north until the first alternative claim sector is reached at Dead Women Pass (Bucket Bend Bay).

The Statement of Issues includes some specific issues relating to geomorphic contentions for particular sectors within the Mississippi Delta. Descriptions of the primary geomorphic claims for these sectors are listed below in the same order as the Statement of Issues. Where secondary alternative claims have been urged by Louisiana, they are also given.

2. **From Dead Women Pass to North Pass.** The primary Louisiana closing line (baseline) claimed here, if more outward historic waters claims are not accepted, is a closing line from X = 2,708,835, Y = 221,440 to X = 2,738,320 to Y = 210,230. Alternatively, if U. S. Exh. 416-D has any effect, Louisiana should also benefit from the additional coast line claims and three-mile projections recognized as proper in that exhibit in the vicinity of Dead Women Pass, using banks of canals or streams used as arc points but for which no coordinates are plotted on the chart in U. S. Exh. 416-D. This alternative is not intended to waive Louisiana's objection to U. S. Exh. 416-D and is by way of rebuttal only. If the coordinate

at X = 2,738,320, Y = 210,230 is not accepted as the eastern natural entrance point of Bucket Bend Bay, then in that event it should serve as an arc point and the next more inward island would certainly be, as a minimum, the suitable natural entrance point. The resultant closing line would be X = 2,708,835, Y = 221,-440 to X = 2,737,065, Y = 210,155. Even if it is found that neither of the low-water elevations along the north natural levee of North Pass constitutes the natural entrance point, they are arc points and the more outward point of the technical mainland of the natural levee of North Pass found at X = 2,736,820, Y = 209,000 would justify a closing line from X = 2,708,835, Y = 221,440 to X = 2,736,820, Y = 209,000.

The enormous extent of uncounted water area of tributary water bodies within Bucket Bend Bay makes clear passage of the semicircle test obvious for whatever line might be chosen, especially given interdistributary subsidence trends.

3. **Pass a Loutre to Southeast Pass area, including Blind Bay.** The alternative claim of Louisiana in the sector of the third group of issues from Pass a Loutre to Southeast Pass under Louisiana's primary geomorphic position is a Lambert Grid coordinate description as shown below.

Here the historic inland water claim of *The Anna*, reinforced by practices of state and federal officials, and also that case's significance juridically in regard to treating mudlumps as part of the mainland, come into focus, with the description of a line extending from the

first coordinate shown below to and around the other coordinates given.

Call	X	Y
From	2,738,935	209,950
through	2,747,065	206,635
through	2,750,755	206,535
through	2,752,010	205,475
through	2,755,325	204,680
through	2,755,178	203,815
through	2,754,925	203,475
through	2,754,100	189,915
through	2,754,263	186,316
through	2,753,885	183,460
through	2,752,470	182,170
through	2,751,045	181,305
through	2,726,105	148,530
to	2,724,850	148,150

Even if Louisiana's contentions that the outermost mudlumps form natural extensions of the mainland levees and as such, natural entrance points of the inner distributary enbayments are rejected, natural entrance points of the embayments bounded by the mudlump groupings at Pass a Loutre and Southeast Pass that are more seaward than the federal contentions may be selected on more inward islands or even on the mainland. For example, if the southeast headland of the indentation between Pass a Loutre and Southeast Pass mouth is found not to be the small mudlump at X = 2,726,105, Y = 148,530 by reason of any government arguments, then certainly the substantially larger mudlump island at X = 2,725,730, Y = 149,795 would be appropriate as the natural entrance point.

4. **From Southeast Pass to South Pass including Garden Island and Redfish Bays.** The primary alternative description line here is from X = 2,724,850, Y = 148,150, to X = 2,702,461, Y = 124,148. Because of its relevance in emphasizing the interrelationship between historic waters and geomorphic alternative arguments here, we point out that this is the very sector in which "claim was given under the direction of the American ambassador . . . for territory of the United States." *The Anna* 5 C Rob. 373. This claim of territory should be understood as generally a claim of territory around the mudlump islands at the mouth of the Mississippi and not strictly limited to the precise situs of the incident involving vessels no more than Chesapeake Bay or Delaware Bay were limited as historic bays to the precise situs of the incidents that gave rise to the claims to those bays. Thus, in effect, the historic waters description based on the claim of *The Anna* should be interpreted as extending around all of the mudlumps but additionally, *The Anna* and the Supreme Court's rulings furnish legal precedent for standards for ascertaining extension of the mainland issues, for selecting the closing line of an unchallenged bay. On the latter issues, if it is not deemed appropriate to use the outermost mudlump at Southeast Pass, a more inward point for the closing line seaward of the federal admission may be used.

5. **South Pass.** The description Louisiana contends should be employed in this sector is:

	X	Y
From	2,702,461	124,148

through	2,701,735	123,905
through	2,701,255	124,130
through	2,701,003	121,725
through	2,701,237	120,486
through	2,701,773	118,961
through	2,701,672	118,777
through	2,701,421	118,995
through	2,701,221	118,945
through	2,701,104	118,141
through	2,700,970	117,990
through	2,700,786	117,889
through	2,700,535	117,889
through	2,699,658	116,782
through	2,698,997	117,204
to	2,697,850	117,200

If Louisiana's contentions on the extensions of additional mudlump islands that were not recognized in the 1959 low-water survey are not accepted, nonetheless, the additional mudlumps for certain time periods are recognized by the federal government. See description connected with what is styled "a newly formed mudlump" shown on Exh. 200 discussed at page 107 of the federal brief before the Master. The federal government had incorrectely argued

> Louisiana proposes a series of straight lines between offshore points which are not indicated as being on islands or low-tide elevations . . . .

This erroneous argument was based on an illustration which did not show the islands, because it was a summary of the lines, not the land points. The islands were not shown on that map but proven by photographs and shown on official charts until removed at the direction of counsel. We point out that *The Anna* also supports

an historic claim around mudlumps in this area, as the nature of the broad claim asserted by the American ambassador was to the areas enclosed by mudlumps. In any event, the United States agrees that the lumps should serve as arc points, as is true with all island-headland closures asserted by Louisiana, *supra*, even if closing lines are not recognized. (See three-mile projections made by the federal government off Southeast Pass on U.S. Exh. 416-D).

6. **From South Pass to Southwest Pass—East Bay.** Louisiana's historic inland waters in East Bay lie within a closing line extending from X= 2,697,850, Y = 117,200 to X = 2,609,180, Y = 91,445.

The next more inward possible closing line is the primary Louisiana juridical contention: Closing line A of La. Exh. 197 and 197A which extends from X = 2,697,850, Y = 117,200 to X = 2,624,995, Y = 108,700. If the Court determines that area measurement Method 3 (the Article 7 system of using islands and tributaries) is correct, then this closing line should be employed even to the present. Prior to the September 17, 1956 chart revision, line A satisfied Method 1 area measurement, so if Method 1 is the only approved method, still Line A should be employed for the accounting covering the period June 5, 1950 until the revision of Chart 1272 dated September 17, 1956.

Closing line B, La. Exh. 197, extending from X = 2,685,325, Y = 133,800 to X = 2,644,940, Y = 134,910 (slightly different if 1970 changes are employed, see La. Exh. 197) would be employed after

September 17, 1956 if Method 3 area measurement were rejected and Method 2 accepted.

Closing line B' would be appropriate for the period since September 17, 1956 if a more outward line is not approved and even if Methods 3 and 2 of area measurement are rejected. It satisfied the Method 1 semicircle test. It is slightly more seaward than line C' or line C because it employs as its eastern headland not the inner tip of Cowhorn Island but the outermost natural entrance point on Cowhorn Island, selected by the bisector of the angle method. Thus, its use depends on approval of that headland selection method for the point shown on Figure 13 of Louisiana's *Brief in Support of the Exceptions to the Report of the Special Master filed July 31, 1974*. Thus, the eastern headland is situated at approximately latitude 29°00′45″N, longitude 89°11′30″W. Its western headland, if the 1959 low-water survey is employed, is found at X = 2,644,940, Y = 134,910. If the charts are employed, its western headland is the tip of the spit paralleling Southwest Pass at approximately latitude 29°00′48″N, longitude 89°19′24″W, shown on the September 17, 1956 and September 17, 1962 editions of Chart 1272.

Closing line C' is appropriate if a more outward line is not used and even if Methods 3 and 2 are rejected. It would be appropriate for the time period commencing with the August 15, 1970 revision of Chart 1272 to the present, if it is decided to recognize the August 15, 1970 chart revision along Southwest Pass, but not to give it effect as to Cowhorn Island

because of inadequacy of the post-hurricane survey work to disprove its continued existence. It would run from the innermost tip of Cowhorn Island, X = 2,677,-650, Y = 138,050 to a point of land at approximately latitude 29°00′22″N, longitude 89°19′51″W as may be located on the August 15, 1970 edition of Chart 1272. See Figure 12 of Louisiana's *Brief in Support of the Exceptions to the Report of the Special Master filed July 31, 1974.*

Closing line C, La. Exh. 197, extending from X = 2,677,650, Y = 138,050, to X = 2,644,940, Y = 134,910, recognized by the Special Master, Report at 34, satisfied even Method 1 and should be utilized if the more outward closing lines are rejected. Its existence should be recognized for the period Cowhorn Island's existence is recognized, as it uses the innermost tip of Cowhorn Island as a headland. It employs as a base map a composite of the Set of 54 Maps as shown in La. Exh. 197, and uses the 1959 low-water survey, which surveyed the shore of East Bay as it existed in November 1959. Line C, prior to the 1959 low-water survey, existed more seawardly, due to the shorter length of the spit which parallels Southwest Pass. Therefore, for the period prior to 1959, if a more seaward line is not recognized, line C's location would be as shown and claimed on the September 17, 1956 chart overlay in La. Exh. 180, with a western headland which is the same as B' line at approximate latitude 29°00′48″N, longitude 89°19′24″W.

Closing line D, La. Exh. 197, extending from

X = 2,672,315, Y = 141,745 to X = 2,644,940, Y = 134,910 must be employed in the absence of the application of a more outward closing line.

7. **From Southwest Pass to Belle Pass: Ascension—Caminada—Barataria Bay complex.** Ascension Bay is an overlarge bay within the meaning of the Convention and Louisiana draws a 24-mile fallback line within it from Empire Canal to a point west of Caminada Pass, i.e. from X = 2,550,402, Y = 216,158 to X = 2,406,890, Y = 189,733. With this determination, the Master concurs. See Report at 46.

The areas covered by issues 8-10 of the Statement of Issues, reprinted as Appendix A-1 of the Master's Report, involve either uncontroverted matters or minor disputes concerning survey or chart questions, plus bayou or small bay mouth issues. Some of these issues are moot under the Master's Ascension Bay findings. Louisiana has taken exception only to the survey or chart questions treated in paragraphs (c) through (e), Report at 47. These pertain to the period of existence of certain low-water lines. Louisiana maintains that the low-water lines of paragraphs (c) through (e) should be recognized even to the present and used as base points for the application of the ruling in paragraph (b), Report at 47, calling for use of the low-water line.

11. **Caillou Bay.** Commencing at X = 2,164,477, Y = 134,753 and proceeding westerly, the historic waters closing line descriptions given *supra* accords

with Louisiana's juridical-geomorphic bay description. Upon a finding that the Special Master too-narrowly construed his authority in the area of Caillou Bay, the closing line found by the Special Master after a full evidentiary hearing, Report at 51, should be employed.

12. **Atchafalaya Bay.** As shown on La. Exh. 194, the closing line here should be from X = 1,987,371, Y = 241,272 to X = 1,855,055, Y = 296,154, but as found by the Master, Report at 52, more outward points on islands or low-water elevations should be given effect as arc points under prior decisions of the Court, 409 U.S. 17.